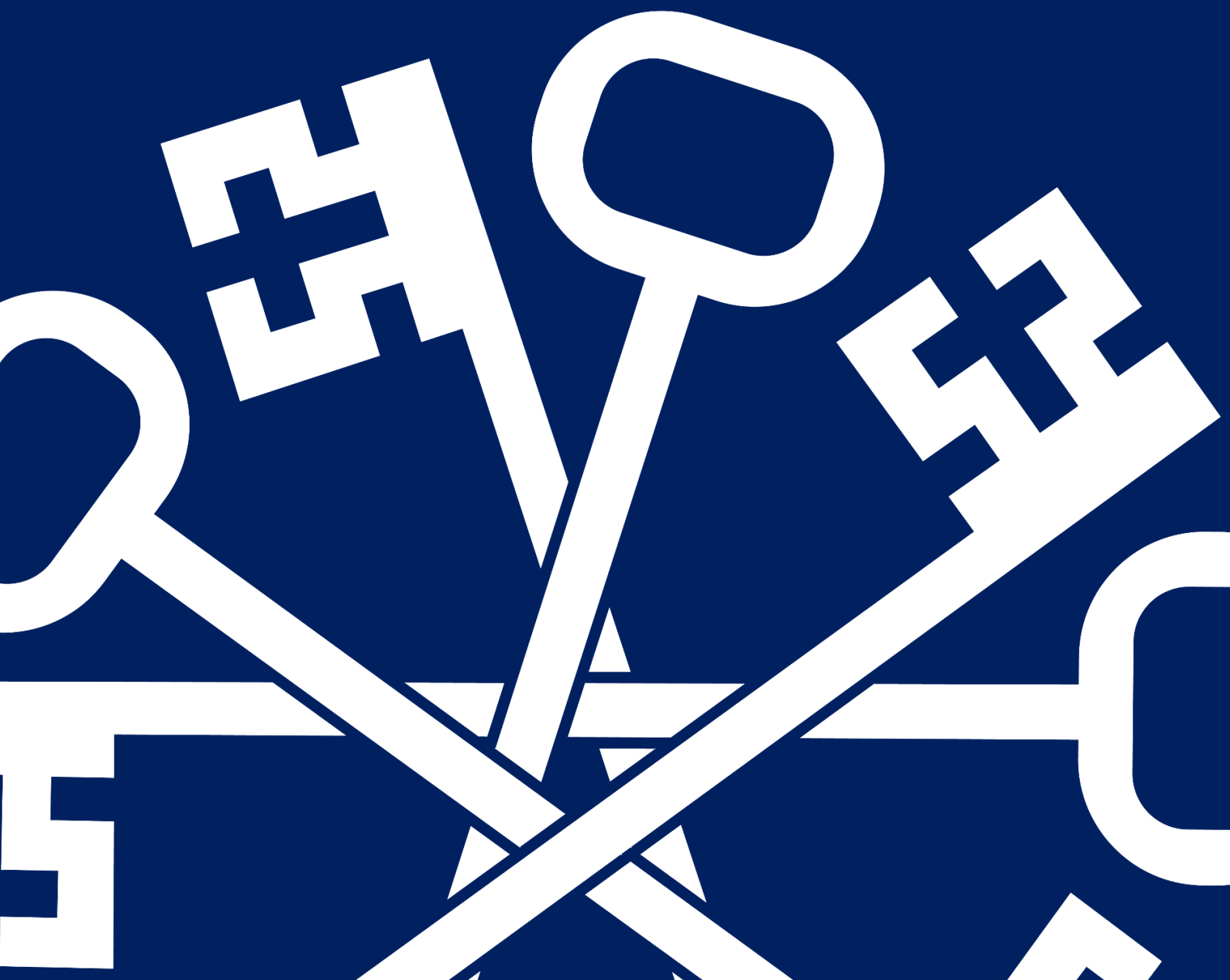




KEYS
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TRUST

Privacy Notice: Volunteers Version 1.0



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1. Policy Statement

- 1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.
- 1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.
- 1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

2. Change Summary

- 2.1. This is the first policy iteration.

3. Introduction

- 3.1. This Privacy Notice for volunteers explains how and why we store personal information about those who visit the Trust. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, our Trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA347488
- 3.2. Keys Academies Trust ("the Trust") is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about volunteers in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

4. The Categories of Volunteer Information That We Process

Personal Information	Name, date of birth, gender, address, email address, telephone number National Insurance number Employee or teacher number Medical conditions
Characteristics	Ethnicity, language, nationality, country of birth
Attendance Information	Sessions attended, number of absences, reasons for absence
Employment / Recruitment / Contract Information	References Self-Disclosure forms DBS checks Verification of the right to work in the UK Start dates Hours worked Post / roles Salary information P45 forms Pensions information
Other	Appraisal / Performance Management notes and reports Qualifications DBS evidence Disciplinary information Grievances

- 4.1. This list is not exhaustive, to access the current list of categories of information we process, please see our Data Protection Policy available on our website.

5. Why We Collect and Use Volunteer Information

- 5.1. We use volunteer information to:
- Enable the coordination of volunteer activities and support within our academies
 - Ensure the safety and welfare of our students and staff
 - Maintain a record of volunteer involvement and training

- d) Comply with legal requirements and safeguarding policies
 - e) Communicate relevant Trust updates and events
- 5.2. Under the UK General Data Protection Regulation (UK GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:
- a) (6a) Consent: volunteers have given clear consent for us to process their personal data for the purposes indicated above.
 - b) (6c) A Legal obligation: the processing is necessary for us to comply with the law.
 - c) (6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (e.g. we are required to have evidence that volunteers have DBS clearance)
 - d) (6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- 5.3. The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.
- 5.4. Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. **Academy name** will work within the conditions of [GDPR - Article 9 of the UK GDPR](#):
- a) (9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include volunteer dietary requirements, and health information we receive from our volunteers who require a reasonable adjustment to access our site and services.
 - b) (9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
 - c) (9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a volunteer in a medical emergency.
 - d) (9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

- e) (9.2g) reasons of substantial public interest. As a Trust, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.
 - f) (9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4- archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.
- 5.5. We process criminal offence data under Article 10 of the UK GDPR.
- 5.6. Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

6. Collecting Volunteer Information

- 6.1. Volunteer data is essential for the Trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this, and we will tell you what you need to do if you do not want to share this information with us.

7. Storing Volunteer Information

- 7.1. We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection Policy and Records Management Policy, available on our website.

8. Who We Share Volunteer Information With

- 8.1. We routinely share aspects of workforce information with:
- a) The Secretary of State
 - b) The Department for Education (DfE)
 - c) Suppliers and service providers with whom we have a contract.

9. Why We Share Volunteer Information

- 9.1. We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

10. Secretary of State

- 10.1. We are required to share information about volunteers with the Secretary of State under section 7 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

11. Department for Education (DfE)

- 11.1. The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.
- 11.2. We are required to share information about our volunteers with the Department for Education (DfE) under section 7 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- 11.3. All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current [government security policy framework](#).
- 11.4. For more information, please see 'How Government uses your data' section.

12. Suppliers and Service Providers

- 12.1. We are required to share certain information about our Trust volunteers with suppliers and service providers (e.g. training providers) to enable them to provide necessary support and services for the volunteer program.

13. Requesting Access to Your Personal Data

- 13.1. The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact gdpr@kestrust.org
- 13.2. You also have the following rights:
- a) the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
 - b) the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
 - c) the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
 - d) the right to ask us to delete your personal information – this is called 'right to erasure'
 - e) the right to ask us to stop using your information – this is called 'right to restriction of processing'.

- f) the 'right to object to processing' of your information, in certain circumstances
 - g) rights in relation to automated decision making and profiling.
 - h) the right to withdraw consent at any time (where relevant).
 - i) the right to complain to the Information Commissioner if you feel we have not used your information in the right way.
- 13.3. There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:
- a) right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
 - b) right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
 - c) right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.
- 13.4. If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO
- 13.5. Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk.

14. Withdrawal of Consent and the Right to Lodge a Complaint

- 14.1. Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.
- 14.2. Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.
- 14.3. If you wish to raise a concern about how we process your personal data, please contact us directly at gdpr@keystrust.org. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.
- 14.4. If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: [Information Commissioner's Office](#)

15. Contact

- 15.1. If you would like to discuss anything in this privacy notice, please contact: gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.

16. Version History

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Privacy notice created using DPO's model notice	Niamh WALSH	19/05/2026

