Privacy Notice – Visitors & Contractors

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Introduction

The trust must collect and process personal information (data) about you when you visit our site in order to effectively manage your visit and meet the legal obligations placed upon us as an organisation and education provider.

This privacy notice outlines what data we collect about you when you visit our site, why we need it and how it is used. The trust process all personal data in accordance with the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act (2018).

Data Controller

The trust is the 'Data Controller' for the personal information that we process about you. This means that we are responsible for your data and make decisions on how it is used.

Data Protection Officer

The trust has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the trust and acts as the first point of contact for any questions or queries regarding data protection.

Our DPO is Miss Danielle Eadie from RADCaT Ltd who is supported by the senior leadership team at the trust and its schools. The DPO is contactable via the trust in the first instance.

The categories of information that we process:

All visitors to the trust and our schools must provide us with the following information upon arrival to help us meet our safeguarding and health & safety obligations:

<u>All Visitors</u>

All visitors to site will be expected to directly input the following information into the visitor screen or book upon arrival:

- Full name
- Email address
- Company name or reason for visit

- Staff member that you are visiting
- Vehicle registration
- Entry & exit times
- Image (ID Badge)

Please note that data required may differ from site-site depending on each schools sign-in processes.

Contractors

If you are a contractor attending site, we will collect some or all of the following information from you or your employer prior to your visit:

- Proof of skills, qualifications and experience (references, CV's etc) to ensure your suitability for the duties we are contracting you to do.
- Accreditations, proof of insurance, letter of assurance and other certifications (safe contractor etc) to meet our health and safety requirements.
- Account information (key contact and payment details etc) to fulfil the agreement we have with you.

DBS Checks

Depending upon the nature of your visit, we may ask you to provide your DBS certificate to comply with our statutory safeguarding obligations. This will typically be limited to visitors directly interacting with our students or those unaccompanied by a staff member.

The trust will not retain a copy of your certificate, we will only log the reference number and date and time that it was checked by ourselves.

CCTV

Closed Circuit Television (CCTV) is in place at some trust sites to maintain security and assist in the prevention and detection of crime. We may also use the system investigate and evidence any inappropriate behaviour that we are notified of.

We do not routinely monitor the CCTV system, the footage is reviewed only if we are notified of an incident. Access to trust systems are strictly limited to a select number of senior staff members. Please request a copy of our CCTV Policy for further information.

Special Category Data

The trust does not routinely process 'special category data' about you when you visit our site. Special category data is information that is much more sensitive in nature and therefore requires extra protection. Examples include details about your health and wellbeing and special characteristics like gender, religion and ethnicity.

It is anticipated that the trust will only process such data in the following scenarios:

- An accident or incident occurs whilst you are on site, and we must fill out an accident form or process your data in the act of providing you or others with assistance.

- We are notified of a safeguarding concern that involves you that puts students or other members of the trust community at risk.

- You inform us of any specific medical conditions or requirements that we need to be aware of to ensure we can accommodate your visit accordingly.

Where we get your information?

Most of the information that we collate will be provided directly by you upon arrival; we may also collect some data from you or your employer prior to your visit in respect of contractors. Any further information will be collated by the trust.

The lawful basis for processing personal data

Under the UK-GDPR, the trust must have a lawful basis to process your personal data. Your data is primarily processed as the trust has a **legal obligation** that requires us to do so or it is required for the performance of a **public task** when carrying out our statutory functions:

Department for Education (DfE)

Keeping Children Safe in Education (2024) obliges schools to monitor visitors to site and perform vetting checks where necessary to ensure the safety of our students. We must log basic information about you including your name, date of visit and DBS check status on each schools 'single central record' to comply.

Safeguarding law also requires us to record and report any safeguarding incidents that we are notified of that may involve you.

Health & Safety at Work Act (1974)

We must also monitor who is on site to comply with health and safety law, namely in the event that a fire or incident occurs that requires evacuation procedures to be activated. Similarly, health & safety law obliges us to:

- record and report details of any accidents involving you
- provide a safe and secure environment for you to operate
- ensure that contractors are safe and qualified to perform their duties
- monitor who is on site to keep them and others in our care safe from harm
- risk assess and provide reasonable adjustments for those visiting site with disabilities and other health and wellbeing concerns; the Equalities Act (2010) also supports this notion.

Further lawful bases

In the case of contractors, we will need to process the personal data of you and your staff to fulfil the terms of any agreement we have with you; we have a **contractual obligation**. For instance, we need your contact details to correspond with you and your payment details to pay your invoice.

In the unlikely event of an accident or incident on site that involves you, we may need to process your personal data in the act of protecting or saving your life or that of another person. For instance, if we provide your name and contact details to the emergency services. In such scenarios, we have a **vital interest** to process your personal data.

In the event that we must process special category data about you, we will typically rely upon one of the following lawful bases in relation to our legal and statutory obligations:

- For reasons of **employment, social security and social protection**
- For reasons of **substantial public interest**

Less commonly, we may need to rely upon the following lawful basis to process your special category personal data if the trust is subject or party to a legal claim involving you:

- **Legal claims and judicial acts:** we must process your special category personal data to fulfil court proceedings, obtain legal advice or establish or defend our legal rights in any way.
- **Substantial public interest (insurance):** we need to share details of an accident or injury with insurers.

Who we share your personal information with?

The trust do not routinely share visitor data unless there is a legal or operational reason to do so. If you are visiting one of our sites with an electronic sign in and out system, your data will be held on a visitor management system hosted by a third-party but managed internally by the respective school.

External auditors (including Ofsted) may need to review visitor data from time to time to ensure the trust is compliant and following best practice in managing those attending site. This process will typically involve the auditor reviewing visitor records only, they do not take any records off site.

Less commonly and typically only if an accident or incident occurs involving you, we may be required to share your data with the following parties:

- Local Authority
- Police and Emergency Services
- Governing Bodies (HSE, ICO etc)
- Insurance Providers
- Professional Advisors (Solicitors etc)
- Courts & Other Enforcement Authorities

If we must share data, we take a minimalist approach to ensure only the necessary amount of information is provided. Data will not be transferred unless there is a secure method of exchange.

Transferring data internationally

We do not routinely transfer your personal data outside of the United Kingdom (UK). If a situation arises whereby we must do so, the trust will ensure that the transfer is compliant with the UK-GDPR's rules on international data processing and is sent via secure methods.

Storing and retaining personal data

To comply with the UK-GDPR, the trust only keep personal data for as long as necessary to meet our legal and operational duties.

Our 'Records Management Policy & Retention Schedule' (available upon request) outlines how long visitor records are kept and how we determine and manage these periods. As a rule of thumb, general visitor records may be kept for up to 1year following your visit. If the site you are visiting has a physical sign in and out book, any retention period will commence from the date of the last entry in the book.

The trust reserves the right to retain records beyond the stated periods if we feel there is compelling reason to do so.

Your personal data is stored securely on site. Records kept in electronic format are stored securely on carefully selected databases and systems that are fully encrypted with password protection and two factor authentication utilised where available. Any physical records are kept in locked cabinets within locked offices and archive rooms; key access is strictly limited depending upon role.

Trust staff and those third parties accessing key pupil records are subject to DBS checks and strict confidentiality agreements.

Requesting access to your personal data and your rights

Under data protection legislation, you have the right to request access to the personal data that the trust holds about you. You have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified if it is inaccurate or incomplete.
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- to restrict our processing of your personal data (i.e., permitting its storage but no further processing).
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

Under data protection law, individuals also have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of personal data if it would cause, or is causing, damage or distress.
- object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- claim compensation for damages caused by a breach of the data protection regulations.

To make a request, please contact the trust in the first instance.

The trust along with the Data Protection Officer (DPO) will support you with your request; a response will be provided within one calendar month. The trust has a legal right to extend this period by a further two months for any requests deemed complex, we will however inform you of our intentions to extend the response time within one calendar month.

Complaints

If you have any concerns at all about how we process your personal data, please contact the trust in the first instance so that we can help resolve any issues. You can raise your complaint by getting in touch with the relevant school office or via the contact details on the trust website:

https://vantageacademies.co.uk/contact-us/

If you remain dissatisfied following our review of your complaint, you have the right to contact the Information Commissioners Office (ICO).