



PRIVACY NOTICE FOR VISITORS AND CONTRACTORS AT THE COLLEGIATE TRUST

This privacy notice describes how *The Collegiate Trust* (hereafter referred to as *TCT* or *the Trust* and always meaning the Trust collectively and each school within the Trust) will collect and use personal information about you during and after your visit, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This notice applies to all current and former visitors and contractors.

Who Collects this Information

The Collegiate Trust is the “data controller.” This means that the Trust is responsible for deciding how personal information about you is held and used. The Trust are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of a contract to provide services and the Trust may update this notice at any time.

It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how your information is processed and the procedures that are taken to protect your personal data.

Data Protection Principles

The Trust will comply with the data protection principles when gathering and using personal information, as set out in the data protection policy.

Categories of Visitor Information Collected, Processed, Held and Shared

The Trust processes data relating to those visiting any of the Trust schools (including contractors). Personal data that may be collected, processed, held and shared (where appropriate) about you includes, but is not restricted to:

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Criminal records information as required by law to enable you to work with children e.g. DBS checks;
- Information relating to your visit, e.g. your company or organisations name, arrival and departure time, car number plate;
- Information about any access arrangements you may need;
- Photographs for identification purposes for the duration of your visit;
- CCTV footage captured by the school.

How this Information is Collected

The Trust may collect this information from you, the Home Office, the DBS, other professionals may be engaged (e.g. to advise us generally), the signing in system, automated monitoring of websites and other technical systems such as the computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

How your Information is Used

The Trust will only use your personal information when the law allows. Most commonly, your information will be used in the following circumstances:

- Where it is required to perform the contract that has been entered into with you;
- Where it is required to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- When you have provided us with consent to process your personal data.

The Trust needs all the categories of information in the list above primarily to allow it to perform contracts with you, with your consent and to enable the Trust to comply with legal obligations.

The situations in which your personal information will be processed are listed below:

- Ensure the safe and orderly running of the Trust;
- To manage the Trusts workforce and those deployed on site;
- Personnel management including retention
- In order to manage internal policy and procedure;
- Complying with legal obligations;
- Carry out necessary administration functions to allow visitors and contractors on site;
- To monitor and manage access to Trust systems and facilities in order to protect its networks and for the purposes of safeguarding;
- To monitor and protect the security of The Trusts networks and information, including preventing unauthorised access to the computer network and communications systems and preventing malicious software distribution;
- To answer questions from insurers in respect of any insurance policies which relate to you;
- Health and safety obligations;
- Prevention and detection of fraud or other criminal offences; and
- To defend the Trust in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure.

Some of the above grounds for processing will overlap and there may be several grounds which justify the Trusts use of your personal information.

The Trust will only use your personal information for the purposes for which it is collected, unless it is reasonable to consider that this is needed to be used for another reason and that reason is compatible with the original purpose.

How Particularly Sensitive Information is Used

Sensitive personal information (as defined under the UK GDPR as “special category data”) require higher levels of protection and further justification for collecting, storing and using this type of personal information. The Trust may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where it is needed to carry out legal obligations in line with the Trusts data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, the Trust may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

Criminal Convictions

The Trust may only use information relating to criminal convictions where the law allows. This will usually be where it is necessary to carry out its legal obligations. The Trust will only collect information about criminal convictions if it is appropriate given the nature of the role and where the Trust are legally able to do so.

Sharing Data

The Trust may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where there is another legitimate interest in doing so. These include the following:

- the Department for Education (DfE);
- Ofsted;
- Law enforcement officials such as police, HMRC;
- LADO;
- Professional advisors such as lawyers and consultants;
- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- The Local Authority; and
- DBS.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, the Trust requires them to respect the security of your data and to treat it in accordance with the law.

The Trust may transfer your personal information outside the UK and the EU. If this happens, you can expect a similar degree of protection in respect of your personal information.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the Trust only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

The Trust will retain and securely destroy your personal information in accordance with the data retention policy. This can be found on The Collegiate Trust website. [The Collegiate Trust | Exceptional Education for All \(tct-academies.org\)](https://www.tct-academies.org)

Security

The Trust have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, the Trust limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of the Trust security procedures within the data breach policy, which can be found on the Trust website.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information held about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information held about you and to check that the Trust is lawfully processing

it. You will not have to pay a fee to access your personal information. However, there may be a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively the Trust may refuse to comply with the request in such circumstances.

- Correction of the personal information held about you. This enables you to have any inaccurate information held about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the Governance and Compliance Manager via DataProtection@tct-academies.org

The Trust may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Governance and Compliance Manager. Once a notification has been received that you have withdrawn your consent, the Trust will no longer process your information for the purpose or purposes you originally agreed to, unless there is another legitimate basis for doing so in law.

How to Raise a Concern

The Governance and Compliance Manager oversees compliance for data protection and this privacy notice, with the support of Judicium who are the Trust's named Data Protection Officer (DPO). If you have any questions about how the Trust handles your personal information, then you can contact the Governance and Compliance Manager via DataProtection@tct-academies.org

The Governance and Compliance Manager will work with the DPO to resolve your query.

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF