

## Privacy notice for suppliers and third party visitors

Under data protection law, individuals have a right to be informed about how the trust uses any personal data we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about visitors to the school, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We, Together Learning Trust, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer (DPO) is Mrs Janine Webb. Our DPO is supported by a nominated Senior Leader for Data Protection within each school. See "Contact us" section below.

### The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Contact details
- Information relating to your visit, e.g. your company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes for the duration of your visit
- CCTV images captured in school
- Information about any access arrangements you may need
- Relevant medical information (for health and safety requirements)
- Special category data – Disclosure and Baring Service information
- Financial Information (such as bank details, invoice information, VAT registration number)

### Why we use this data

We use this data to:

- Identify you and keep you safe while on a school site
- Keep pupils and staff safe
- Maintain accurate records of visits to each school
- Provide appropriate access arrangements

### Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we need to comply with our legal obligation to keep our pupils and staff safe while on the school premises.

Less commonly, we may also process your personal data in situations where:

- We need it to perform an official task in the public interest
- We have obtained consent to use it in a certain way
- We need to protect someone's vital interests (save your life, or someone else's)
- We need to fulfil a contract we have entered into with you

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

Where we process special category data we will identify both a lawful basis and a separate condition for processing under UK GDPR Article 9.

### **Collecting this information**

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information to us. Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice. We will only collect the data that we need in order to fulfil our purposes, which are set out above.

### **How we store this data**

We will keep your personal data while you are visiting our school. We may also keep it beyond this, if necessary, to comply with our legal obligations. Our Records Management Policy / Record Retention Schedule sets out how long we keep information about visitors. This is available online via the trust website or from the Trust Central Team in hard copy (see 'Contact Us' below). We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We will dispose of your personal data securely when we no longer need it.

### **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about visitors with:

- Our local authority – to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- The Department for Education – to meet our statutory and legal obligations to share certain information with them
- Educators and examining bodies – necessary in the performance of our education function
- Our regulator, Ofsted – to enable it to evaluate the education we provide, and which is in the public interest
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Central and local government – to meet statutory and legal duties and to enable the performance of contracts
- Our auditors – to demonstrate that we have taken appropriate action in providing our education service
- Health authorities – to assist where there are legal obligations
- Security organisations – with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- Health and social welfare organisations – to support a legal entitlement
- Professional advisers and consultants – to support a legal entitlement and to assist with insurance claims
- Police forces, courts, tribunals – in order to uphold law and order
- Professional bodies – to verify information for legal purposes
- The organisation/company you are representing – to verify business interests and to verify information for legal purposes

### **Your rights**

#### **How to access the personal information we hold about you**

Individuals have a right to make a 'subject access request' to gain access to personal information that the trust holds about them. If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you

- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact the individual school in the first instance.

### **Your other rights regarding your data**

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

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than 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 exercise any of these rights, please contact the individual school in the first instance.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the designated school contact in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- 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

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the senior leader responsible for Data Protection in the relevant school. Alternatively, you can also contact the Central Trust Team for further information:

**Bolton Brow Primary Academy:** 01422 831031

Paul Kelesidis – Headteacher

**Honley High School:** 01484 506484

Amanda Haigh – School Business Manager

**Meltham Moor Primary School:** 01484 859032

Liz Woodfield - Headteacher

**Netherton Infant and Nursery School:** 01484 661832

Emma Barker - Headteacher

**Ryburn Valley High School:** 01422 832070

Mark Thorley – Business and Compliance Manager

**Brooksbank School:** 01422 374391

Nicola Davies – Business and Compliance Manager

**Together Learning Trust Central Team, Data Protection Officer:** 01422 483355

Janine Webb - Director of Business, Operations and Compliance