

Privacy Notice – Visitors & Contractors



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Introduction

The Vantage Academy Trust (herein referred to as 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 our health & safety and safeguarding obligations. This privacy notice outlines what data we collect about you when you visit us, why we need your information and how it is used.

All personal data processed by the trust is done so in accordance with the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act (2018).

The trust is the **Data Controller** for the personal data that we process about you which means we are responsible for the data you provide to us.

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 its schools 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 can be contacted via our respective school offices or directly using the following details:

T: 01942 590 785 | E: Danielle.eadie@radcat.co.uk

What personal data do we process about you, where we get it and why we need it?

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

All Visitors

All visitors to site will directly input the following information into the electronic visitor screen at reception:

- Full name for identification purposes.
- Contact details should we need to correspond with you about your visit.
- Company name (where applicable) to identify the reason for your visit.
- Entry and exit times to monitor who is on site for fire purposes.

- The staff member who has organised your visit to confirm your arrival and check that your visit is legitimate to meet our safeguarding obligations.
- Vehicle registration to support with our parking provision and maintenance.
- Image of you for identification, security and safeguarding purposes.

Where applicable we will collect the following information directly from you upon arrival or prior to your visit:

- DBS information (where applicable) to meet our safeguarding obligations and auditing commitments. We will only retain your DBS reference number and date of the check.
- Access arrangements, medical conditions and / or special dietary requirements that we need to be aware of to effectively manage your visit and keep you safe onsite.

Contractors

In addition to the information above, we will collect some or all of the following personal information directly from contractors prior to your visit to site:

- References, CV and details of employment history.
- Safe contractor status & evidence; qualifications, certifications, insurances & compliance documentation.
- Payment details to process and fulfil your invoicing (only personal data if sole trader).

We need this information from contractors for the following purposes:

- Decide whether to engage with you.
- Fulfil the terms of any contract with you including payment.
- Keep accurate records of the suppliers the trust uses.
- Keep pupils, staff and other members of the school community safe.
- Maintain accurate records of visits to the school.

CCTV

Closed Circuit Television (CCTV) is in place at some trust sites; our CCTV system will capture images of you when you visit us. CCTV helps us to ensure site security and supports in the prevention and detection of crime.

Incidents & Accidents

If an incident or accident occurs on site that you are party to, we will record the details to meet our health & safety and safeguarding obligations. Examples include completing accident forms and reporting more significant incidents to the emergency services and relevant governing bodies.

Lawful Bases and Purposes for Processing

Under the UK-GDPR, the trust must have a lawful basis to process your personal data, we rely upon the following:

- The trust has a **legal obligation** to process your personal data, namely when keeping a record of who is on site to meet our health & safety and safeguarding obligations.

- The processing of your personal data is necessary to perform a **contractual obligation** for instance when we take steps to enter into a service agreement with you as a contractor; we need your personal information to fulfil a current or potential contract that you are party to.
- The trust must process your personal data to meet a **public task** for example when utilising CCTV for site security and processing DBS information to keep members of the trust community safe and secure.
- If an incident or accident occurs on site, the trust may process your personal data in the act of protecting or saving yours or the life of another individual; there is a **vital interest** to process your personal data. The processing of your personal data under this lawful basis is typically limited to sharing your name, contact details and other relevant information with emergency services if an accident or incident occurs.

Special Category Data

‘Special Category Data’ is information about you that is much more sensitive in nature such as details relating to your health & wellbeing. When processing such data, we must meet an additional lawful basis from the UK-GDPR to ensure the processing is strictly necessary.

The trust only process special category data relating to visitors if an accident or incident has occurred or in situations where you make us aware of any disabilities, medical conditions and access requirements needed to support you during your time on site. When processing such data, the trust rely upon the following lawful basis:

- **Substantial public interest:** we are processing special category data to support you and meet our obligations under the Health & Safety at Work Act (1974) and Equalities Act (2010).

Who we share your personal information with?

The trust will only share your personal data if it is required to meet a legal obligation or an operational duty relating to visitor management.

The trust routinely share your data with the provider of our visitor management system; your data is logged and stored by the system each time you visit site and sign in and out of the screen at reception. For sole trading contractors, we will share your personal data with our bank and provider of the trust financial management system in order to fulfil your invoice payments.

In certain circumstances we may share your data with the following parties:

- Auditors who assess trust record keeping standards and processes to ensure best practice. In the case of contractors, this includes assessing the trusts fair procurement process.
- Local Authority if we need to report a safeguarding concern that you are party to.
- Emergency Services if an incident or accident occurs that you are party to.
- Governing Bodies to meet our reporting obligations; e.g., HSE if a significant injury occurs.
- Insurers if we need to enact, support or defend a claim that you are party to. E.g., if your car is damaged on our car park, you may wish for us to confirm that you were on site.
- Professional Service Advisors if we need to seek external advice relating to an incident to which you are party, for instance our solicitors.
- Courts if the school is involved in a legal claim that you are party to.

- The organisation you are representing if we need to provide them with progress reports and feedback about you (contractors only).

The trust perform strict checks on third parties that we share your data with to ensure they meet the high standards of compliance expected under the UK-GDPR.

Do we transfer your data internationally?

The trust do not routinely transfer visitor data outside of the United Kingdom, however some of the third parties with whom we share your personal data may store data on international servers. In such circumstances, we will ensure the relevant safeguards are in place and data protection standards are complied with fully.

How we store your personal information?

The personal data that you provide to us when you sign in at reception is stored electronically as part of our visitor management system. Information that we receive or collate prior to or during your visit is stored securely in electronic format on the school server. The trust have implemented technical security measures on all electronic systems to ensure your data is secure and confidential.

Staff will only access your personal data if it is strictly necessary to perform their duties; all trust staff are subject to data protection training, confidentiality agreements and routine DBS checking.

How long we keep your personal information?

The trust only retain personal data for as long as necessary to fulfil the purposes for which it was collated. Data is stored in line with the trust 'Records Management Policy & Retention Schedule' a copy of which is available upon request. As a rule of thumb, general visitor data will be kept for up to 12months, whilst financial records relating to contractors must be kept for 6years.

What are your rights?

Under the UK-GDPR, you have a right to access the personal data that we hold about you by making a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it.
- Explain why we are processing it and how long we will hold it.
- Explain where we collected the data if not from you.
- Outline if the data has been or will be shared with any other parties.
- Inform you if any automated decision making has been applied to the data and provide any consequences of this.
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights under the UK-GDPR:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete.
- The right to ask us to erase your personal data in certain circumstances.
- The right to ask us to restrict the processing of your personal data in circumstances.
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

If you would like to exercise any of your rights, please contact the trust's Data Protection Officer (DPO) in the first instance.

A response will be provided to you within one calendar month. The trust reserves the right to extend the response time by a further two calendar months if your request is complex, we will however inform you of any intention to extend within the first month.

Complaints

If you have any concerns at all about how we process your personal data, please contact us in the first instance so that we can help resolve any issues.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk>