

Privacy Notice for Visitors and Contractors

Your personal data

St Paul's First School is committed to protecting the privacy and rights of anyone who shares their personal data with us. Under data protection laws, individuals have a right to be informed about how we use the personal data that we hold about them; privacy notices (sometimes called fair processing notices) are used to provide this information. Individuals can find out more information about the UK GDPR [here](#).

This privacy notice explains what personal information the Academy collects and holds about visitors and contractors. It explains why we hold this information, what we do with it, how long we keep it for and if we share it with anyone else.

The Academy is the Data Controller; this means that we determine the purposes for which, and the manner in which, personal data relating to visitors and contractors is processed in order to comply with our legal and official functions as an employer and educational establishment.

A data protection representative for the Academy, Mrs Joanne Cole, can be contacted on 01902 291124 or Office@st-pauls-coven.staffs.sch.uk in the first instance for any queries in relation to the processing of your personal data.

Staffordshire University Academies Trust has a Data Protection Officer whose role is to support the Trust and its' Academies with data processing practices. The DPO can be contacted on 01782 987120 or dpo@suatrust.co.uk.

The information you provide will be used in accordance with the Staffordshire University Academies Trust data protection policies can be found by accessing the Trust's website - <http://www.suatrust.co.uk/documents---policies>. Please note that this privacy notice may be updated at any time.

The personal data we process

The personal information that the Academy collects regarding visitors and contractors will be utilised to meet our statutory duties and to fulfil our purpose as a public sector organisation.

We process data relating to those who visit and undertake contracted works in our Academy. Personal data that we collect, use, store and when appropriate, share, about you includes but is not restricted to:

- Name
- Organisation
- Telephone number
- Time on and off site
- DBS number and date (where relevant to the reason for the visit)

- Identification
- Vehicle registration
- Training and competency (where relevant to the reason for the visit)
- Monitoring data about your use of the Academy's IT system
- Call recordings to school
- Any accessibility requirements
- Information relating to accidents and incidents on site
- Data relating to child protection and safeguarding incidents

Why we collect and use personal information

When you provide data in relation to your visit and / or work at the Academy, you will be providing the Academy with personal data for the purpose of helping us to comply with legal and educational requirements, including to:

- Ensure staff and children are safe in school;
- Maintain security on the premises to safeguard staff and children;
- Adhere to statutory guidance;
- Ensure health and safety procedures are followed;
- Conduct any work that the contractor has been contracted for.

The Academy will request identification from visitors on arrival; ID be used to verify the identity of the visitor/contractor by suitable means. To enable us to safeguard our pupils, in accordance with the nature of the visit, DBS data will also be verified on arrival of the visitor/contractor in accordance with the latest Keeping Children Safe in Education guidance. No copies of DBS certificates will be taken, however, the Academy will record where a DBS has been seen and verified.

The Academy collects the individual's name, company name, vehicle registration and times of the visit to fulfil the Academy's legal duty to safeguard pupils and staff to ensure they are safe in schools, visitors/contractors have been approved to enter the premises and are identifiable.

This data is also used to ensure that the Academy is able to adhere to health and safety requirements, ensure visitors are safe on Academy premises and particularly to ensure that they can be safely evacuated from the building and registered at the evacuation point in the case of an emergency, and can access the premises safely.

Where the visit requires and as relevant to the purpose of their visit, the Academy will check the competency of the individual attending site, to ensure that they are appropriately trained to conduct the services they are contracted for on Academy premises.

The Academy may use their signing in system to take a photograph of visitors / contractors in order to produce an identification badge for the visitor to use whilst they are on the premises. This pass is used for safeguarding purposes to ensure that staff and pupils can identify that the visitor / contractor has signed in and been approved to enter the building. Visitors / contractors will be required to securely dispose of this pass on departure from the building.

The Academy has Wi-Fi on site for the use of visitors / contractors and where the use of WiFi is required for the visit, will provide the visitor with the relevant login information.

Through use of the WiFi system the Academy requires visitors to adhere to the Acceptable Use Policy. We record the device address and will also log traffic information in the form of sites visited, duration and date sent/received. The purpose for processing this information is to provide you with access to the internet whilst visiting our site and to protect our systems and network from cyber security risks associated with third party devices.

We may also use information about you that falls into "special categories" of more sensitive personal data. This includes information about disability, health and access requirements where applicable, to ensure that appropriate access arrangements can be provided for visitors / contractors who require

them. This data will be verified prior to arrival at the Academy where a visitor / contractor has particular health or access requirements that the Academy must support for the duration of the visit.

Where we require your consent for collecting data, this will be specified on the form for the request of data. Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with the UK GDPR, we will inform you at the point of collection, what information is needed whether consent is required to provide this information and who you should speak with if you have any queries about sharing information with us.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Our lawful basis for using this data

The data of visitors / contractors is essential for the Academy's operational use to facilitate keeping children safe in education and ensure that the safety of visitors / contractors is maintained within the setting.

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Process the data for the performance of a contract (Article 6(1)b)
- Comply with a legal obligation (Article 6(1)c)
- Carry out a task in the public interest (Article 6(1)e)
- Legitimate interest (Article 6(1)f)

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way (Article 6(1)a)
- We need to protect your vital interests, or someone else's vital interests (Article 6(1)d)
- As a recognised legitimate interest under the Data Use and Access Act

We collect data which is specified under the UK General Data Protection Regulation as Special Category Data, known as data that could be considered particularly sensitive. This means that, under the UK GDPR, we have obligations to keep this data secure and use it where:

- We have explicit consent (Article 9(a))
- Where we need to protect the vital interests of an individual (Article 9(c))
- We have a legitimate interest as a not for profit organisation (Article 9(d))
- For the safeguarding of children and individuals at risk (Paragraph 18, Schedule 1, Data Protection Act 2018)

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Academy's use of your data.

Collecting visitor and contractor information

Visitors' and contractors' personal data will be sought from the data subject themselves. Third parties will be contacted to obtain visitors' personal data with the data subject's consent, unless the Academy has a legal basis for doing so without consent.

If the purpose of the visit is for a contractor to work on site, we may contact your employer for key information about you, as relevant according to the reason for your visit. This may include information about training and competence, your name and job role, and confirmation of DBS clearance. This data will be used to verify eligibility to attend site prior to the visit, in advance of attendance.

Visitor and contractor data is essential for the Academy's use to ensure site safety and safeguarding requirements are met. 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.

Storing visitor and contractor information

Once your visit has been completed we will retain this file and delete the information in it in accordance with our Retention and Records Management Policy. Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. Your data will be stored securely within our internal filing systems.

The Academy will not share your personal information with any third parties without your consent, unless the law allows us to do so. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information.

If you require further information regarding retention of data, and the periods for which your personal data is held for, please download our Record Management and Retention Policy from the Trust website <http://www.suatrust.co.uk/documents---policies> or request a copy from the Academy's Data Protection Representative.

Who we share personal information with

Where it is legally required, or necessary for another reason permitted under data protection law, we may share personal information about you with:

- Our local authority, Staffordshire County Council
- The Department for Education (a government department)
- Suppliers and service providers, including professional bodies, professional advisers and consultants – so that they can provide the services we have contracted them for, for example, employment background check providers and solicitors and/or insurance providers managing legal claims
- Our auditors.
- Our multi academy trust.

Rights of individuals

The UK-GDPR gives you certain rights about how your information is collected and used. This includes the right to the following in certain circumstances:

- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- To be informed about the collection and use of your personal data – this is called 'right to be informed'.

- 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.
- To ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- To ask us to delete your personal information – this is called 'right to erasure'
- To ask us to stop using your information – this is called 'right to restriction of processing' i.e. permitting data to be stored but not processed any further.
- To object to processing of your information.
- To withdraw consent at any time (where relevant).

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:

- The right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- The right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- The 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.
- The right to access shall be subject to the relevant exemptions. **This includes where a reference is received or provided and marked as a confidential reference. The reference which is given or received shall be exempt from issue in response to a subject access request where this is given in confidence.**

If you want to request access to the personal information we hold about you, please contact Mrs Joanne Cole on 01902 291124 or office@st-pauls-coven.staffs.sch.uk.

If you are concerned about the way we are collecting or using your information, please raise your concern with the Academy's DPL in the first instance. You can also contact the ICO at <https://ico.org.uk/concerns> or via the following means:

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

How to withdraw consent and lodge complaints

Where our Academy processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the Data Protection Lead. We take any complaints about our collection and use of personal information very seriously.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The Academy will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact our Data Protection lead or visit our [Homepage - St Pauls Coven](#)