



Privacy Notice – Visitors and Contractors

Related document to P14 – Data protection and GDPR

Policy Owner: Chief Operating Officer (COO)

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Version Control Information

Reason for Amendment	Role	Date	Main Changes
Annual review	Chief Operating Officer	Michaelmas 2024	Transfer to new template

Privacy notice for visitors and contractors

St Dunstan's Education Group is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your visit with us, 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 relates 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 privacy notice applies to all current and former visitors and contractors.

Who collects this information

St Dunstan's Education Group ('the Group') is a 'data controller.' This means that we are responsible for deciding how we hold and use personal information about you.

We 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 we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

The categories of visitor and contractor information that we collect, process, hold and share

We process data relating to those visiting schools within the Groups. Personal data that we may collect, process, hold and share, 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 CCTV systems operated by the Group.

How we collect this information

We may collect this information from you, the Home Office, the Disclosure and Barring Service (DBS), other professionals we may engage to advise us, our signing-in system, automated monitoring of our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

How we use this information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to perform the contract we have entered into with you
- Where we need to comply with a legal obligation, e.g. 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 our 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.

We need all the categories of information in the list above primarily to allow us to perform our contract with you, with your consent and to enable us to comply with legal obligations. Please note that we may process your information without your knowledge or consent, where this is required or permitted by law.

The situations in which we will process your personal information are listed below:

- Ensuring the safe and orderly running of the Group and the individual schools
- Managing our workforce and those deployed across the Group's sites
- Personnel management, including retention
- Managing internal policy and procedure
- Complying with legal obligations
- Carrying out necessary administration functions to allow visitors and contractors on site
- Monitoring and managing access to our systems and facilities in order to protect our networks and for the purposes of safeguarding
- Monitoring and protecting the security of our network and information, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution
- Answering 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
- Defending the Group or individual schools 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 our use of your personal information.

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.

How we use particularly sensitive information

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. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent:
- Where we need to carry out our legal obligations in line with the Group’s 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, we 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.

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

Sharing data

We 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 we have another legitimate interest in doing so. These include the following:

- The Department for Education (DfE)
- Independent Schools Inspectorate (ISI)
- Disclosure and Barring Service (DBS)
- Law enforcement officials such as the police, HMRC

- Local Authority Designated Officer (LADO)
- Professional advisors such as lawyers and consultants
- Support services, including HR support, insurance, IT support, information security, pensions and payroll
- The local authority

Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

Retention periods

Except as otherwise permitted or required by applicable law or regulation, the Group 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.

To determine the appropriate retention period for personal data, the Group considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.

The Group typically retains personal data for six years, or for as long as the data is required subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period.

Security

We 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, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

You can find further details of our security procedures within the Data Breach Policy and Information Security Policy.

Your rights of access, correction, erasure and restriction

It is important that the personal information we hold 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 we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold 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 Chief Operating Officer in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In 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 COO in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Who to contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the COO the first instance.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which

cannot be resolved by the COO, then you can contact the DPO on the details below:

Data Protection Officer: St Dunstan's Education Group

Address: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

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 at <https://ico.org.uk/concerns>.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.