

Frank Field Education Trust



Visitors and Contractors Privacy Notice

Policy Information:

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Approved by CEO:

Tom Quinn

Approved by Chair of Board:

Dr. Chris Hampshire



Frank Field
Education Trust

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Overview

- 1.1 Frank Field Education Trust (FFET) takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the **Data Protection Act 2018** (the 'DPA') and the **EU General Data Protection Regulation** ('GDPR' now UK GDPR) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
- 1.2 This policy applies to visitors and contractors. If you fall into one of these categories then you are a 'data subject' for the purposes of this policy. You should read this policy alongside your contract for services and any other notice we issue to you from time to time in relation to your data.
- 1.3 FFET has separate privacy notices in place in respect of staff, students and their families. A copy of these can be obtained from the Trust's website.
- 1.4 FFET has measures in place to protect the security of your data in accordance with our Data Security Policy. A copy of this can be obtained from the Trust's website.
- 1.5 FFET will hold data in accordance with our Data Retention Policy. A copy of this can be obtained from the Trust's website. We will only hold data for as long as necessary for the purposes for which we collected it.
- 1.6 FFET a '**data controller**' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.
- 1.7 This policy explains how the FFET will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, FFET.
- 1.8 This policy does not form part of your contract for services if relevant and can be amended by the FFET at any time. It is intended that this policy is fully compliant with the 2018 Act and the UK GDPR. If any conflict arises between those laws and this policy, the FFET intends to comply with the 2018 Act and the UK GDPR.

2. Data Protection Principles

2.1 Personal data must be processed in accordance with six '**Data Protection Principles.**' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;

- not be kept for longer than is necessary for the purposes for which it is processed; and be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

3 How we define personal data

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

- Names, characteristics and contact details of representatives and other individuals employed by you or working on your behalf who we liaise with, and who are carrying out duties under your contract with us
- References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- Bank details and other financial information where it relates to an individual, such as if you're operating as a sole trader
- Any other personal information necessary to fulfil the terms of a contract we have with you
- If our contract with you requires you or your representatives, employees or agents to visit or carry out any work at the school site, we may also collect, use and store:
 - Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate
 - Photographs for identification purposes
 - CCTV images captured in school
 - Information about any access arrangements that may be required
 - Disclosure and Barring Service Enhanced check (where appropriate)

4 Why we use this data

4.1 We use this data to:

- Decide whether to engage you
- Fulfil the terms of our contract with you, including payment
- Keep accurate records of the suppliers that we use
- Identify you and your representatives, employees and agents while on the school site, and keep all individuals safe
 - Keep pupils and staff safe while you or your representatives, employees or agents are on the school site
 - Keep accurate records of visits to the school

4.2 The lawful basis on which we process this information

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

- Fulfil a contract we have entered into with you
- Comply with a legal obligation 2

Less commonly, we may also use this personal information 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 an individual's vital interests (save someone's life)

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 your personal information overlap, and there may be several grounds which justify the school's use of this data.

5 Collecting this information

Some of the information we collect from you is mandatory, and in some cases, it is optional. Whenever we seek to collect personal information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying. We will only collect the data that we need in order to fulfil our purposes, which are set out above.

6 Storing this information

Where personal information is relevant to our contract with you, we keep it according to our record retention schedule and our statutory obligations. We also keep personal information about you, your representatives, employees and agents whenever you/they visit our Trust or its schools. We may keep it beyond the visit if this is necessary in order to comply with our legal obligations. Our record retention schedule sets out how long we keep this information. 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. The Records Management and Retention Schedules Policy is available on the Trusts website.

7 Who we share this information with

We do not share information about suppliers or their representatives, employees or agents without 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 you with:

- our local authority
- the Department for Education (DfE)
- Education service providers to enable them to provide the service we have contracted them for (such as academic websites for study purposes).

Full details contained within our Data Protection Policy

8 Transferring data internationally

Where we transfer personal data to a country or territory outside the United Kingdom, or the EU we will do so in accordance with data protection law.

9 Your rights

How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school 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 the 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 our Data Protection Officer.

10 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 by 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 our Data Protection Officer.

11 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 our Data Protection Officer. 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

12 Further information

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer, Mr Keeffe via info@ffet.co.uk or 0151 3189700