Privacy Notice for Visitors and Contractors

This privacy notice describes how we collect, store and use personal information about you during and after your relationship 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, which supplements it by setting out additional provisions on matters such as the processing of personal data is specific sectors, exemptions, the powers of the Information Commissioner, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply within the EU and to organisations that process personal data of individuals located in the EU.

This privacy notice also covers the use of Artificial Intelligence (AI) systems which may process personal data as part of educational and administrative functions. We are committed to transparently explaining how these technologies are used and the data they process.

This notice applies to all current and former visitors and contractors.

Who Collects This Information.
The 3-18 Education Trust (Trust) 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 with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

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

Categories of Visitor Information We Collect, Process, Hold and Share
We process data relating to those visiting our school (including contractors). Personal data that we may collect, process, hold and share (where appropriate) about you includes:

- 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 school where installed.
- Data processed by AI systems, which may include, information about IT usage, and automated administrative tasks.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions.

How We Collect This Information
We may collect this information from you, the Home Office, the DBS, other professionals we may engage (e.g. to advise us generally), 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 Your 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 (such as health and safety legislation, under statutory codes of practice).
- 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.

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

- Ensure the safe and orderly running of the Trust.
- To manage our workforce and those deployed on a Trust site.
- Personnel management including retention.
- In order to manage internal policy and procedure.
- Complying with legal obligations.
- Carry out necessary administration functions to allow visitors and contractors on site.
- To monitor and manage access to our systems and facilities in order to protect our networks and for the purposes of safeguarding.
- To monitor and protect the security of our network and information, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution.
- To answer 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.
- To defend the Trust 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. Where appropriate, AI systems may be used to support some of these purposes, for example to assist with administrative tasks or improve operational efficiency.
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

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 where we have a lawful basis to do so and one of the following conditions applies:
In limited circumstances, with your explicit written consent;

- To comply with legal obligations, such as safeguarding or equality requirements;
- For reasons of substantial public interest, in line with our Data Protection Policy (for example, for safeguarding or equality monitoring).
- Where necessary to establish, exercise, or defend legal claims;
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent.

Criminal Convictions
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.

Use of Artificial Intelligence
We employ AI technologies to support various educational and administrative functions. These technologies are designed to comply with data protection laws and are implemented with safeguards to protect your privacy. If you have any concerns about the use of AI in processing your data, please contact our Data Protection Officer

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);
- Ofsted;
- Other schools within the Trust.
- Law enforcement officials such as police, HMRC;
- LADO;
- Professional advisors such as lawyers and consultants;

- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- Shropshire Council.
- The Pupil's home local authority.
- DBS.
- Other schools within the Trust

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.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Retention Periods
Except as otherwise permitted or required by applicable law or regulation, the Trust 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.

We will retain and securely destroy your personal information in accordance with our Records Management Policy, which is available on request.

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.

You can find further details of our security procedures within our Data Breach policy and our Information Security policy. These policies are available upon request.

Your Rights of Access, Correction, Erasure and Restriction
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 Trust's IT Director in writing.

Right to Withdraw Consent
In the limited 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 Trust's IT Director. 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.

Contact
If you would like to discuss anything within this privacy notice or have a concern about the way your personal data is collected or used, we request that you raise your concern with the Trust's IT Director in the first instance. We will acknowledge receipt of your complaint within 30 calendar days and will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available upon request.

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 Trust's IT Director**,** then you can contact the DPO on the details below:
Data Protection Officer: Judicium Consulting Limited
Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk

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.
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

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.