

Old Earth Primary School

Privacy Notice for Suppliers and Third Party Visitors

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about our visitors. We, Old Earth Primary School, Lower Edge Rd, Elland HX5 9PL, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Janine Webb (see 'Contact us' below).

The personal data we hold

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

- Name
- Contact details
- Information relating to your visit, e.g. your company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes for the duration of your visit
- CCTV images captured in school
- Information about any access arrangements you may need
- Relevant medical information (for health and safety requirements)
- Special category data – Disclosure and Baring Service information
- Financial Information (such as bank details, invoice information, VAT registration number)

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Disability and access requirements

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Identify you and keep you safe while on the school site
- Keep pupils and staff safe
- Maintain accurate records of visits to the school
- Provide appropriate access arrangements

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we process it to comply with our legal obligation to keep our pupils, staff and visitors safe while on the school premises.

Less commonly, we may also use personal information about you 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 someone's vital interests (save your life, or someone else's)
- We need to fulfil a contract we have entered into with you

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

Where we process special category data we will identify both a lawful basis and a separate condition for processing under UK GDPR Article 9.

Collecting this information

Whilst the provision of the majority of personal data is mandatory, some of it is provided to the school on a voluntary basis. In order to comply with the UK data protection requirements, the school will inform you whether you are required to provide certain information or if you have a choice.

When collecting data, the school will inform you if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected, how the data will be used and how consent can be withdrawn

How we store this data

We will keep your personal data while you are visiting our school. We may also keep it beyond this, if necessary, to comply with our legal obligations. Our data protection policy sets out how long we keep information about visitors.

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.

A copy of our record retention schedule/records management policy is available on the school website.

Data sharing

We do not share information about you with any third party without your 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 visitors with:

- Our local authority – to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- The Department for Education – to meet our statutory and legal obligations to share certain information with them
- Educators and examining bodies – necessary in the performance of our education function
- Our regulator, Ofsted – to enable it to evaluate the education we provide, and which is in the public interest
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Central and local government – to meet statutory and legal duties and to enable the performance of contracts
- Our auditors – to demonstrate that we have taken appropriate action in providing our education service
- Health authorities – to assist where there are legal obligations
- Security organisations – with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- Health and social welfare organisations – to support a legal entitlement
- Professional advisers and consultants – to support a legal entitlement and to assist with insurance claims
- Police forces, courts, tribunals – in order to uphold law and order
- Professional bodies – to verify information for legal purposes
- The organisation/company you are representing – to verify business interests and to verify information for legal purposes

Transferring data internationally

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.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the DPO or the school.

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing

- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the school office.

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Janine Webb, Director of Business, Operations and Compliance, Together Learning Trust, c/o The Brooksbank School, Victoria Road, Elland, HX5 0QG (01422 483355)