



Wellington School Privacy Notice for Visitors & Suppliers to the School

Under 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 visitors to the school, in line with the UK General Data Protection Regulation (UK GDPR) under the Data Protection Act 2018.

We, **Wellington School**, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Matthew Keefe from Keefe and Associates Ltd is the Data Protection Officer and the person who the school has nominated to support and advise on technical data protection matters. The Headteacher is the school contact for data protection matters. Their role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with UK GDPR. The data protection officer can be contacted on 0161 928 4157 or via admin@wellington.trafford.sch.uk.

The personal data we hold

We collect the following types of data in order to comply with our legal obligations to you and our parents and students.

For Visitors: -

Personal data that we may collect, use, store and share (when appropriate) about you 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

For Suppliers: -

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

Why we use this data

The following are the reasons why we use your data at the point of entry or collection.

For visitors - We use this data 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

For suppliers - 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

Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we need to comply with our legal obligation to keep our pupils and staff safe while on the school premises and also where we need to:

- Fulfil a contract we have entered into with you

Less commonly, we may also process your personal data in situations 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)

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 personal information about you overlap, and there may be several grounds which justify our use of your data.

Collecting this information

Some of the information we collect from you is mandatory, and in some cases, you can choose whether or not to provide the information to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

How we store this data

We will keep your personal data while you are visiting our school or while you are a supplier of the school.

We may also keep it beyond this, if necessary, to comply with our legal obligations.

Our records management policy sets out how long we keep information about visitors, and for suppliers where personal information is relevant to our contract with you, we keep it according to our records management policy and our statutory obligations.

We also keep personal information about you, your representatives, employees and agents whenever you/they visit our school. We may keep it beyond the visit if this is necessary in order to comply with our legal obligations.

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.

Data sharing

We do not share information about visitors or suppliers with any third party 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 visitors with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as where the visitor or supplier information is relevant to a safeguarding concern*
- *The Department for Education*
- *Educators and examining bodies*
- *Our regulator e.g. Ofsted, Independent Schools Inspectorate*
- *(Where applicable) Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Central and local government*
- *Our auditors*
- *Health authorities – e.g. the NHS ambulance service*
- *Security organisations – e.g. our outsourced monitoring service for supplier that commence work prior to school being open*
- *Professional advisers and consultants – to seek advice where necessary to protect the school's interests*
- *Police forces, courts, tribunals*
- *The organisation or company you are representing*
- *NHS and or Public Health England*

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area or any other country, we will do so in accordance with data protection law.

Your rights

How to access the 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 a 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.

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 a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its 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.

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

When will this Notice be updated?

This privacy notice was last updated on 22 November 2022.

We reserve the right to vary and amend this privacy notice to comply with the changes to legislation. A up to date copy of this notice will be available on the School website.

This notice is based on the [Department for Education's model privacy notices](#), amended for visitors and suppliers to reflect the way we use data in this school.