Privacy Notice for Visitors and Contractors

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) was incorporated into UK law as retained EU law and is now known as the UK GDPR. The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as processing in specific sectors, exemptions, the powers of the Information Commission 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 notice applies to all current and former visitors and contractors.

Who Collects this Information

Ted Wragg Multi Academy Trust is the data controller and gathers and uses certain information about you. The Trust is responsible for deciding how personal information is held and used. Individual academies process visitor and contractor personal data on behalf of the Trust when administering visits and work at academy sites.

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 you understand how we are processing your information 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 academies or Trust sites (including contractors). 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. the Disclosure and Barring Service 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 Trust and/or individual academies.

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

- Ensure the safe and orderly running of the Trust and its academies;
- To manage our workforce and those deployed on 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; and
- 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.

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 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 our Data Protection Policy (for example, to comply with health and safety duties for contractors or visitors on site);
- For reasons of substantial public interest, such as safeguarding pupils and staff, preventing unlawful acts, or ensuring site security;
- To establish, exercise or defend legal claims;
- Where it is necessary to protect your vital interests (or those of another person) and you are unable to give 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.

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 and academies 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);
- The Local Authority/Authorities for each academy within the Trust; and

- DBS.

Information will be provided to those agencies securely and/or anonymised where possible.

We also use third-party visitor-management, access-control, CCTV, communications, IT support and contractor-management systems. These providers may process visitor or contractor personal data on our behalf where necessary to provide their services. Appropriate data protection and security arrangements are required.

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. Where we do so, we will ensure appropriate safeguards are in place, such as adequacy decisions, the UK International Data Transfer Agreement or EU Standard Contractual Clauses with the UK Addendum. Further details can be provided upon request.

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 Data Retention Policy, available under Data Protection Policies on the Data Protection Page.

Security

We have put in place measures to protect the security of your information, including against it being accidentally lost, used or accessed in an unauthorised way. Access is limited to employees, agents, contractors and other third parties with a business need to know. Details of these measures are available under Data Protection Policies on the Data Protection Page.

Further details of our security procedures are available in the Data Breach Policy under Data Protection Policies on the Data Protection Page.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are required to ensure that appropriate safeguards are in place when using automated decision making for significant decisions and the circumstances in which we are permitted to use special category data (sensitive information) in automated decision making are limited.

You will not be subject to automated decision making for significant decisions unless we have a lawful basis, and a valid condition where required, for doing so and appropriate safeguards are in place. Appropriate safeguards include informing the relevant individuals about the automated decision making and their rights to request a human review, express their views, and contest the decision.

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 dataprotection@tedwraggtrust.co.uk 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).

Right to Withdraw Consent

In the limited circumstances where you have provided consent for a specific purpose, you may withdraw that consent at any time by contacting dataprotection@tedwraggtrust.co.uk. We will stop processing for that purpose unless another lawful basis applies.

Contact

If you would like to discuss anything within this privacy notice or have a concern about how we collect or use your personal data, please contact dataprotection@tedwraggtrust.co.uk in the first instance. We will acknowledge your complaint within 30 calendar days and investigate and respond without undue delay. Further information is available in our Data Protection Policy on the Data Protection Page.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection legislation and this privacy notice. If your question cannot be resolved by the Trust Data Protection Team, you can contact the DPO using 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

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commission's Office (ICO), the UK supervisory authority for data protection issues.

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.