



ENDEAVOUR LEARNING TRUST

VISITORS & SUPPLIERS DATA PRIVACY STATEMENT

1 INTRODUCTION

- 1.1 Endeavour Learning Trust (“the Trust”) is committed to protecting the privacy and security of its visitors personal information. This Visitors & Suppliers Privacy Statement provides you with important information about what, how, where, why and when the Trust collects and processes your personal data.
- 1.2 This statement should be read in conjunction with our Data Protection Policy which contains more generalised information about our data protection procedures.
- 1.3 The Trust is what is known as the ‘Controller’ of the personal data you provide to us or which we collect from third parties about yourself. This means that Trust is responsible for deciding what personal data (information) we gather and how we hold and use it.
- 1.4 The Trust is registered with the Information Commissioner’s Office (ICO).
Registration number ZA462273.
- 1.5 The Trust processes personal data in accordance with data protection law. This includes the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 1.6 This statement applies to all visitors to school premises and some members of the general public.

2 WHAT IS PERSONAL DATA?

- 2.1 Personal data is any information that ‘relates to’ an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly (e.g. because it includes your name).
- 2.2 It also includes information relating to you, from which you cannot be directly identified, if you can be identified from that information when it is used in combination with other information we hold about you.
- 2.3 Personal data can include information relating to you that has been ‘pseudonymised’, meaning that any information that directly or indirectly identifies you (e.g. your name) is removed and replaced with one or more artificial identifiers or pseudonyms (e.g. visitor number).
- 2.4 However, truly anonymous data, or data that has had any identifying information permanently removed from it, does not count as personal data.
- 2.5 When considering whether information ‘relates to’ you for the purposes of data protection legislation, we consider a range of factors, including the content of the information, the purpose or purposes for which we are processing it, and the likely impact or effect of that processing on you.

3 WHAT IS ‘PROCESSING’?

- 3.1 Any activity that involves the use of your personal data is referred to as processing (or process). It includes:
 - 3.1.1 Obtaining, recording or holding personal data (e.g. asking you to complete forms);
 - 3.1.2 Carrying out any operation or set of operations on personal data such as organising, amending, retrieving, using, disclosing, erasing or destroying it (e.g. recording relevant information on your personnel file, or maintaining pay records); and
 - 3.1.3 Transmitting or transferring personal data to third parties (e.g. transferring payroll data to HMRC).



4 WHAT TYPES OF PERSONAL DATA DO WE COLLECT & PROCESS?

- 4.1 Any activity that involved the use of personal data is referred to as 'processing'. The Trust processes many different categories of staff information. This may include for Visitors:
- 4.1.1 personal identifiers and contacts (such as name, contact details and address);
 - 4.1.2 information relating to your visit (such as your company or organisation name, arrival and departure time)
 - 4.1.3 details of your representatives
 - 4.1.4 vehicle registration details
 - 4.1.5 photographs for identification purposes for the duration of your visit
 - 4.1.6 CCTV images captured in the building owned by the Trust
 - 4.1.7 Information about any access arrangements you may need
 - 4.1.8 Information in relation to safeguarding
 - 4.1.9 Information you may send to us or enter on our website
 - 4.1.10 Any information you choose to share with us
 - 4.1.11 publicly available sources including online resources (e.g. company websites or social media accounts).
- 4.2 Data as detailed above will be collected for Suppliers but this can also include:
- 4.2.1 Names, characteristics and contact details of representative 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.
 - 4.2.2 Disclosure and Barring Service Checks confirmation (letter of assurance)
 - 4.2.3 References, CVs and details of and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
 - 4.2.4 Bank details and other financial information where it relates to an individual, such as if you are operating as a sole trader
 - 4.2.5 Any other personal information necessary to fulfil the terms of a contract we have with you

5 HOW DO WE COLLECT PERSONAL DATA?

- 5.1 Most of the personal data the Trust collects is provided to us directly by you. We will only collect information we need in order to fulfil our purposes.
- 5.2 Most of the information you provide to us is mandatory, however, some will be requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

6 HOW DO WE USE PERSONAL DATA?

- 6.1 Most of the personal data relating to its workforce the Trust processes is provided to us directly by you for one of the following reasons specifically for Visitors
- 6.1.1 To identify you and keep you safe while on our Trust (school) site
 - 6.1.2 To account for any visitor to our premises in the event of an evacuation or lockdown.
 - 6.1.3 To keep children (pupils/students) and staff safe
 - 6.1.4 Maintain accurate records of visits to the school



- 6.1.5 Provide appropriate access arrangements; and
- 6.1.6 Meet our statutory duties
- 6.2 For Suppliers we may use this data for the above reasons and:
 - 6.2.1 Decide whether to engage in a contract with you
 - 6.2.2 Fulfil the terms of our contract with you, including payment
 - 6.2.3 Keep accurate records of the suppliers we use

7 **LAWFUL BASIS**

- 7.1 We collect and use visitor information under the General Data Protection Regulation (UK GDPR) which set out the lawful reasons that we can process your data are:
 - 7.1.1 Article 6.1a – consent (in limited circumstances);
 - 7.1.2 Article 6.1c – processing is necessary for compliance with a legal obligation to which we are subject; or
 - 7.1.3 Article 6.1e – processing is necessary for the performance of a task carried out in the public interest.
- 7.2 Where we have obtained consent, this may be withdrawn at any time. We will make this clear when we ask for your consent, and explain how to withdraw it.

8 **PROCESSING THE PERSONAL DATA OF THIRD PARTIES**

- 8.1 In some limited circumstances, and for specified purposes, we will also process personal data relating to third parties, such as your next of kin and/or dependants. For example, we may need to process their personal data in an emergency situation. Where this occurs, we may contact your next of kin and/or dependants separately to explain why we need to process their personal data.

9 **HOW DO WE STORE YOUR PERSONAL DATA?**

- 9.1 The Trust stores visitor data for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our data retention policy on the Trust's or School's website.
- 9.2 We have in place appropriate security measure to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, alternated or disclosed.

10 **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

- 10.1 The Trust does not share personal information with anyone without consent unless the law and (if applicable) our policies allow us to do so.
- 10.2 The Trust may routinely share your information with:
 - 10.2.1 the local authority;
 - 10.2.2 the police and other statutory bodies (e.g. DBS or TRA)
 - 10.2.3 the Department for Education (DfE);
 - 10.2.4 Ofsted
 - 10.2.5 Auditors, legal advisers
 - 10.2.6 within our Multi Academy Trust.
- 10.3 We may also share your personal data with third parties as directed by you.



11 CHANGES TO YOUR PERSONAL DATA

11.1 It is important that the personal data we hold about staff is accurate and current. Please keep us informed if your personal information changes during your time at the Trust by contacting the HR department or your line manager.

12 YOUR DATA PROTECTION RIGHTS

12.1 Under data protection law, you have rights, including;

12.1.1 **Right to be informed** – about how and why your data is being used.

12.1.2 **Right of access** – you have the right to ask us for copies of your personal information;

12.1.3 **Right to rectification** – you have the right to ask us to rectify personal information you think is inaccurate or to ask us to complete information;

12.1.4 **Right to erasure** – you have the right to ask us to erase your personal information in certain circumstances;

12.1.5 **Right to restriction of Processing** – you have the right to object to the Processing of your personal information in certain circumstances;

12.1.6 **Right to data portability** – you have the right to ask that we transfer the personal information we hold about you to another organisation.

12.1.7 **Right to not to be subject to a decision based solely on automated processing** – for decisions that have a legal or similarly significant effect on individuals.

12.2 You are not required to pay any charge for exercising your rights. If you make a request we must respond in one month.

12.3 Please contact the school directly or Catherine White, Data Protection Officer, 01772 817904, c.white@endeavourlearning.org, if you wish to make a request on

13 HOW TO COMPLAIN OR WITHDRAW CONSENT

13.1 If you have any concerns about our use of your personal information, wish to exercise your rights in relation to your Personal Data, or make a complaint, please let us know by contacting the Data Protection Officer, Catherine White, if you wish to make a request on 01772 817904 / c.white@endeavourlearning.org

13.2 You can also complain to the Information Commissioner's Officer (ICO) if you are unhappy with how we have used your data. Tel: 0303 123 1113 (Mon to Fri 9am to 5pm) <https://ico.org.uk/concerns>.

14 CHANGES TO THIS DATA PRIVACY STATEMENT

14.1 We keep our practices and policies regarding the collection, Processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this Data Privacy Statement at any time. We will notify you of any changes made at the appropriate time and may re-issue a new Data Privacy Statement if appropriate.

Reviewed: Spring 2025