

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) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018, and the modernised framework of the Data (Use and Access) Act 2025 (DUAA).

It applies to all current and former visitors and contractors.

Who Collects this Information

Initio Learning 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 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 Trust (including contractors). Personal data that we may collect, process, hold and share (where appropriate) about you includes, but 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. 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 Trust.

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.
- Where it is necessary for the purposes of a "Recognised Legitimate Interest" under the Data (Use and Access) Act 2025 (such as safeguarding vulnerable people or the prevention and detection of crime);
- 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 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.

How we use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as “special category data”) requires 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;
- Where it is needed in the public interest, such as for equal opportunities monitoring;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your 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;
- 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; and
- DBS.

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.

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.

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.

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. Please note that under the Data (Use and Access) Act 2025, the Trust is only legally obligated to provide confirmation and personal data that can be located following a reasonable and proportionate search for the requested information.
- **Correction of the personal information we hold about you.** This enables you to have any inaccurate information we hold about you corrected. Please note that where records reflect historical events, professional opinions, or safeguarding reports, these represent a factual record of what was reported or understood at that specific time. In these circumstances, the Trust cannot erase or alter the original historical record. Instead, we will fulfil your right to rectification by appending a supplementary statement to the file.
- **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. Please note that this is not an absolute right. The Trust cannot erase personal data where we are required by law to retain it (for example, statutory pupil records, attendance registers, or safeguarding files), or where it is necessary for the performance of a task carried out in the public interest.
- **Restriction of processing your personal information.** You can ask us to suspend processing personal information about you in certain circumstances.
- **To object to processing in certain circumstances.** Please note: You have an absolute right to object to your data being used for direct marketing.
- **To challenge significant decisions** made about you based solely on automated processing, and obtain human intervention.
- **To transfer your personal information** to another party.

If you want to exercise any of the above rights, please contact your relevant school's Headteacher, or the Data Protection Officer. 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). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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 notify the school office. 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.

How to Raise a Concern

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 relevant school's Headteacher or their delegate, then you can contact the DPO on the details below:

Data Protection Officer: Tracy Broadbent

- Address: Allenbourn Middle Trust, East Borough, Wimborne, BH21 1PL
- Email: privacy@initiolearning.org
- Telephone: 07761 045361

If your concern amounts to a formal complaint regarding the Trust's handling of your personal data, it will be managed in accordance with our statutory obligations. The Trust will acknowledge your data protection complaint without undue delay and the Data Protection Officer will provide a formal written outcome within one calendar month of receipt, as outlined in our main Data Protection Policy.

You also have the right to make a complaint at any time to the Information Commission, 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 Commission, 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.