



Privacy Notice for Visitors and Third-Party Workers

Policy Owner:	Data Protection Officer
Approved by:	Trust Board
Last reviewed:	December 2024
Next review due by:	December 2025

Due to the evolving nature of The CAM Academy Trust, procedures behind this Policy will be reviewed and amended accordingly to reflect changes.

At the heart of our work lie the six core principles of The CAM Academy Trust. These drive everything that we do.



Privacy Notice for Visitors and Third-Party Workers

The Cam Academy Trust is classed as a 'Data Controller' under the UK General Data Protection Regulation (UKGDPR) for all the academies which are part of the trust. The Trust is registered with the Information Commissioner's Office and follows the principles of the UKGDPR. This privacy notice covers all members, trustees, for all academies within the Trust.

This privacy notice explains how we collect, store and use personal data about Visitors and Visitors and Third-Party Workers, working within the Trust in a voluntary/paid capacity including teacher trainees.

1.Keep us up to date

It is important that you let us know if there are any changes to your situation or personal details. This is so that we can manage your data and communicate with you safely and quickly. Please let us know straight away if any of the following change:

- Your name • Address • Phone number (including mobile) • Email address

We will contact you using the most recent address, email or phone number you have given us. If you do not tell us promptly about a change in your details, you may not receive information that could be important – or it could fall into the wrong hands. Where you have provided an e-mail address, we will use this for important messages that relate to you.

2.The categories of Visitors and Visitors and Third-Party Workers information that we collect, hold and share include:

The categories of Visitors and Visitors and Third-Party Workers information that we collect, process, hold and share include, but is not limited to, the following:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Personal information (such as name, address, car registration)
- Characteristics information (such as gender, age, marital status, ethnic group)
- Next of kin and emergency contact numbers
- Contract information
- References and other information included in a CV or cover letter or as part of the application process
- training records and professional memberships
- Absence data information (such as number of absences and reasons)
- Photographs for identification purposes, MIS records and School notice boards and websites
- CCTV footage in schools where CCTV cameras are installed in main areas for security purposes
- Data about your use of the school's information and communications system

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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements
- Health, including any medical conditions, and sickness records
- personal data revealing religious or philosophical beliefs personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health (including but not limited to medical conditions, medication, special needs, disabilities, allergies, dietary conditions)
- data concerning a person’s sex life
- data concerning a person’s sexual orientation

3. Why we collect and use this information.

The purpose of processing this data is to help us run the Trust, 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
- Support effective training and assessment
- Education, training and development requirements
- Gathering evidence for possible grievances/complaints
- Dealing with legal disputes involving you, or other employees, Visitors and Visitors and Third-Party Workers and contractors,
- including accidents at work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT policies
- Where we need to comply with a legal obligation or statutory duty
- To support ‘Track & Trace Services in the event of a national or local pandemic
- for detection/prevention of crime, bullying or any incident that occurs on site (CCTV footage)
- publish blurbs on academy/trust website with your explicit permission
- meet our obligations within minutes of meetings, copies of which are held permanently

The Academy Trust may make use of limited personal data relating to all for fundraising, marketing and promotional purposes such as school prospectus and to maintain relationships with stakeholders.

4. The lawful basis on which we use this information

We collect and use Third –party information under:

- UK General Data Protection Regulation
 - Article 6(1)(a) – consent
 - Article 6(1)(c) – legal obligation o Article 6(1)(e) - public task
 - Article 9(2)(a) – explicit consent
 - Article 9(2)(g) – substantial public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else’s interests) such as providing medical
- information to emergency services

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

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.

Our disclosure of personal data is lawful for the following reasons:

- The Academy Trust is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing information because it is necessary in order to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose your information. However, if at any time it appears to us that we would need consent then this will be sought before a disclosure is made.

4.1 Our basis for using special category data

- For ‘special category’ data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:
- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting Third -party Information

We collect personal information directly from:

- Employees of supplier companies
- Contractors
- Visitors
- Those providing a service to the Trust
- Trainee teachers

Whilst the majority of information provided to us by Visitors and Third-Party roles is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

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.

6. Storing Visitors and Third-Party Data

We hold all data securely for the set amount of time shown in our retention schedule. For more information and to view our Data Retention Policy please visit <https://www.catrust.co.uk/key-information/policies>

We do not normally transfer information to a different country which is outside the European Economic Area. This would only happen if you move to that country and specifically ask us. If this happens, we will be very careful to make sure that it is safe to transfer the information. We will look at whether that other country has good data protection laws for example. If we cannot be sure that it is safe then we will talk to you about it and make sure that you are happy for us to send the information. As this is not something we normally do, and we do not know which country we might need to send information to, we cannot provide more information about it now but if we want to transfer data to a different country then we will tell you whether or not we think it is safe and why we have decided that.

7. Who we share Visitors and Third-Party information with

We treat all information we hold about you private and confidential to our organisation. We will not reveal any personal details concerning you to anyone not connected with the Cam Academy Trust or listed below unless:

- You ask us to provide information, or we have your consent to do so
- We are required or permitted to do so by law, including but not limited to sharing minutes of meetings, publishing attendance and pecuniary interests
- It is required by law enforcement
- There is a duty to the public to reveal the information, e.g. regulatory bodies, tax authorities, the Department for Education or Education and Skills Funding agency.

We routinely share information with:

- the Department for Education (DfE)
- The Cam Academy Trust
- Members of staff
- Other Academies within the Trust
- OFSTED
- External auditor
- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- Educators and examining bodies
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations

- Survey and research organisations
- Trade unions and associations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- Public Health England

Additional Visitors and Third-Party disclosures can be found within our Data Protection Policy. We use a selection of cloud hosted solutions throughout the Trust to provide educational services. We only use providers who have a GDPR policy, have undertaken a self-certification process and are on the DfE's approved cloud services list. We will only use cloud services where we can be confident that our data is processed within the UK or EU and subject to the UKGDPR requirements.

The latest version of the policy can be downloaded from our website: <https://www.catrust.co.uk/key-information/policies>

The information disclosed to these people / services may include sensitive anonymised personal information about Third parties; usually this means information about ethnicity, language and nationality where applicable.

When you give us information about another person, you need to ensure you have permission from them to provide us with their information.

8. Why we share information

We do not share information about Visitors or Third -parties with anyone without consent unless the law and our policies allow us to do so. We share data with the Department for Education (DfE) on a statutory basis. We may be required to share information about individuals in Visitors and Third-Party roles with the Department for Education (DfE)

All data is entered manually on the school management information system (MIS) and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

9.Data collection requirements

To find out more about the requirements placed on us by the DfE including the data that we share with them, go to <https://www.gov.uk/government/news/national-database-of-governors>

Some of these personal data items are not publicly available and are encrypted within the system. Access is restricted to authorised DfE and education establishment users with a DfE Sign-in account who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the department, unless the law allows it.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they are holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the department, you should make a subject access request (SAR). Further information on how to do this can be found within the department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact DfE: <https://www.gov.uk/contact-dfe>

10. Artificial Intelligence (AI)

Artificial Intelligence technologies may be employed to enhance the educational experience and support the academic development of pupils / students at schools within the Cam Academy Trust. (AI) is defined in the school's policy (please see the school's AI policy for further information) as the development of computer systems that can perform tasks that typically require human intelligence, including but not limited to problem-solving, learning, and decision-making in the classroom.

We will ensure that any AI applications or tools used for collection and sharing of personal and sensitive data within the Trust comply with existing data protection laws and regulations.

11. Requesting access to your personal data

Information about you will be held by us in both paper form and on our IT systems and will be kept in line with our retention procedures.

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 Data Protection lead at the school which you are a Member/Trustee/Committee, by telephone, email, or write to the school. Or you can email or write to Data Protection Officer Mrs Carolyn Duckett cduckett@catrust.co.uk or The Cam Academy Trust, Cambourne Village College, Sheepfold Lane, Cambourne, CB23 6FR.

We may need to see proof of identity to ensure we are not releasing data to the wrong person. There may be a small administrative fee for this service – if so, we will make this clear.

You also have the right to:

- ask us to correct any information we have about you if you think it is wrong or incomplete
- ask us to erase information about you (although we may have good reasons why we cannot do this)
- ask us to limit what we are doing with your information object to what we are doing with your information
- ask us to transfer your information to another organisation in a format that makes it easy for them to use

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance to the DPO via the contact details above.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

12. Automated Decision-Making Processes

We do not employ any automated decision-making processes within our trust. If we did, you would have the right to:

- Give written notice requiring us to not take any automated decision using your personal data
- Be informed of when an automated decision is taken
- Ask us to reconsider a decision taken by automated means

If, in the future, we move to using automated decision-making processes, we will notify you of this and of your rights under the regulations.

If at any time you are not happy with how we are processing your personal information, then you may raise the issue with the Data Protection Officer on the contact details above and if you are not happy with the outcome you may raise a complaint with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate)

13. Contact us:

If you have any questions or would like to discuss anything in this privacy notice please contact the Trust Data Protection Officer Carolyn Ducket at cducket@catrust.co.uk

If you have a concern or a complaint about how we collect and use your personal data, you should raise your concern with the school in the first instance. You can do this by contacting the data protection lead at the school or you can email the Trust data protection officer cducket@catrust.co.uk or write to Data Protection Officer, The Cam Academy Trust, Cambourne Village College, Sheepfold Lane, Cambourne, CB23 6FR.

There is more information in our Data Protection Policy which can be downloaded from our website: <https://www.catrust.co.uk/key-information/policies>

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113