

Privacy Notice – Other third parties

Approved by RET Board

Approved on May 2018

SLT contact Headteacher

Revision due Every 2 years



Privacy Notice – GDPR & Data Protection Bill 2018

Other third parties

Background

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 applies to all individuals whom we collect, store and use personal data about (except in relation to parents, students, the school workforce, school governors, trustees and volunteers, which are all dealt with under separate privacy notices). This includes individuals in the categories listed below or who work for any of the following:

- Our suppliers e.g. any individuals involved in providing contracts for goods and services to the school
- Our regulators, lawyers, insurers, auditors, professional advisors and other professional contacts
- Visitors to the school's premises who are not included under one of the other privacy notices listed above
- Individuals involved with commercial lettings at our school premises
- Others who get in touch with us, e.g. with questions, complaints, feedback (in this instance we expect that the individual will be in control of the personal information they wish to provide to us)
- Visitors to our school website/sixth form website

Each RET School is the 'data controller' for the purposes of data protection law.

The personal data we may hold

In the course of the above circumstances, the personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact information for individuals such as name, address, email address, contact numbers. We may seek further personal information to enable identity of individuals to be verified.
- Information about an individual's personal situation or professional capacity
- Information about individuals employed or associated with our suppliers/advisors or other associates
- Payment information
- Images captured on onsite CCTV
- Website data via the use of cookies which store certain data such as IP addresses, time of visit etc (See Cookies Policy).

Why we use this data

We only obtain and process your information as necessary in connection with the purpose we have engaged with you (as detailed, but not limited to the circumstances listed above). We may use such data as follows:

- To facilitate our contractual/supply agreements and the day to day operation of these agreements such as billing, payments, internal record keeping, auditing and complaints handling.
- To comply with legal obligations and disclosures required/permitted by law.
- To support the provision of professional advice where we may have sought this or to respond to legal claims.
- To facilitate and support lettings of our premises and the day to day operation of these agreements such as personal identity information, billing, payments, internal record keeping and complaints handling.
- To help us answer questions from the public and deal with complaints.
- In respect of personal ID information and CCTV - To safeguard our premises, students and staff.
- In relation to Cookies - to support use of our website and improve our website service.

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to during our contact with you and for keeping records of the process. We will only process your personal information most commonly, where we need to:

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- Carry out our contract with you or to take steps you ask of us before entering into a contract with you
- Comply with a legal obligation
- Carry out a task in the public interest
- You have given us specific and explicit consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

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 the school's use of your data.

How we store this data

Personal data we collect during our contact with you is stored in line with our Data Protection Policy. Our Data Protection Policy explains that we retain records in accordance with the [Information and Records Management Society's toolkit for schools](#). We will take reasonable and appropriate steps to protect your personal information which we hold, from misuse and have procedures in place to ensure this.

Data sharing

We do not share information about you with any third party without your 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 you with:

- Governors as required to support their involvement in the governance of this school
- Third party providers such as IT service providers
- Police forces/Courts/Regulatory bodies
- Other Russell Education Trust schools and the Trust's central team to support the effective management and operation of the school, for example to facilitate benchmarking exercises.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, 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 refer to the information set out in Section 11 of the School's Data Protection Policy, the Subject Access Request Form and guidance on our website or contact our Data Protection Officer at DPO@Russelleducationtrust.org.uk.

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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 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 at DPO@russelleducationtrust.org.uk

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 at DPO@Russelleducationtrust.org.uk

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- **Email address:** DPO@Russelleducationtrust.org.uk
- **Address:** Data Protection Officer, Russell Education Trust, Manor House, The Crescent, Leatherhead, Surrey, KT22 8DY. Please mark private and confidential for the attention of the Data Protection Officer.