

Privacy Notice – Visitors, suppliers, third parties

Revision Due: August 2025



Privacy Notice for visitors, or suppliers and other third parties who have contact with the Russell Education Trust or its schools. There are separate privacy notices for parents, students, staff and governors.

1. Introduction

- a. Under data protection law, individuals have a right to be informed about how an organisation uses any personal data held about them.
- b. The Russell Education Trust ('the Trust') and each of our schools, collects and holds personal information relating to individuals such as visitors to the Trust and its schools, suppliers of goods and services and other individuals who it may come into contact with. This may include, but are not limited to, lawyers, insurers, professional contacts, alumni, members of the public who engage with us, for example about our premises, to provide feedback or make complaints and visitors to our websites.
- c. This Privacy Notice explains how, during the course of our activities as an academy trust, we will collect, store and process personal data about you.
- d. This Privacy Notice applies to all personal data held by the Trust as a multi-academy trust and by individual schools in the Trust.
- e. The Trust, (The Russell Education Trust, 1 Park Road, Teddington, TW11 OAP), is the 'data controller' for the purposes of data protection law.
- f. Our Data Protection Officer is Jo Townsend (see 'Contact Us' below).

2. The personal data we collect, hold and share include:

- a. Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
 - Your personal information such as your contact details.
 - Employment details and/or professional details.
 - Car registration details.
 - References or CVs such as those collected as part of a tender or bidding process.
 - Payment information such as bank details.
 - Information concerning Gift Aid donations.
 - Website data via the use of cookies, which store certain data such as IP addresses and time of visit.
 - Details of complaints you have made or contact you have had with our staff.
 - Photographs and CCTV images captured as part of identification and security procedures at our premises.
- b. We may also collect, use, store and share (where appropriate) information about you that falls into "special categories" of more sensitive personal data. This may include but is not limited to:
 - Information about your health conditions, disabilities, or other medical information for example where you have provided this information to facilitate access arrangements or catering provision.
 - Health information kept as part of first aid and accident reporting.
 - Disclosure and Barring Service (DBS) information, where appropriate, to comply with safeguarding requirements.

3. Why we use this data

- a. We use your personal information to:
 - Get in touch with you.
 - Stay in touch in future, for example alumni communications.
 - Help us build a community around our school.
 - Notify you of events you may be interested in.
 - Keep you up to date with news about our schools.
 - Tailor communications we send to you, to ensure they are appropriate and relevant to you.

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- Facilitate visits to our premises.
- Identify you while at our premises.
- Protect your health and safety and that of others at our premises.
- Maintain accurate records of visitors to the Trust and our schools.
- Comply with our safeguarding obligations.
- Provide appropriate access arrangements.
- Decide whether to enter into a contract with you.
- Fulfil the terms of our contract with you, including payments.
- Comply with legal obligations and disclosures required/permitted by law.
- Support the provision of professional advice, for example, to respond to legal claims.
- Facilitate and support contracts for services and lettings of our premises and the day-to-day operation of these agreements such as safeguarding requirements, billing, payments, internal record keeping and complaints handling.
- Help us answer questions from the public and deal with complaints.
- Support use of our website and improve our website service.
- Assess the quality of our services.

a. Use of your personal data in automated decision making and profiling

We do not currently process your personal information through any automated decision making or profiling process. This means we don't make any decisions about you using only computers without any human involvement. If this changes in future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

b. Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting Trust and school events, campaigns, charitable causes or services that you might be interested in. You can take back this consent at any time by contacting us (see 'Contact us' below).

4. Our lawful basis for using this information

- a. We only collect and use your personal data when the law allows us to. The Trust needs to establish a lawful basis to do this as set out in data protection law.
- b. Our lawful bases for processing your personal information are typically:
 - We need to process the information to fulfil our contract with you or to take steps you ask of us before entering into a contract with you.
 - We need to comply with a legal obligation – this means that we need to process the data to meet our responsibilities under law.
 - We need it to perform a task in the public interest – this means we need to use your data to fulfil our official functions in our schools and as an educational Trust.
 - 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) – for example in a medical emergency.
 - We have legitimate interests in processing the data where there is minimal privacy impact and we have a compelling reason to do so.
- c. Where you have provided us with your consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent and will explain how you would go about withdrawing your consent, in which case, the information about you will no longer be collected or processed.
- d. **Our basis for using special category data**
Special categories of personal data will normally only be processed under the following legal grounds ('special category' information includes information about a person's racial or ethnic origin, political

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opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or Biometric Data):

- We need to process the information for reasons of substantial public interest in complying with legal obligations, for example, for the purposes of equality of opportunity and treatment.
 - We are legally obliged to collect and use it in relation to employment, social security, or social protection law.
 - We need to protect you or someone else, for example providing your medical information to the emergency services where there is a medical emergency.
 - We have obtained specific and explicit consent to use your information in a certain way.
 - We intend to use it to make or defend legal claims.
 - 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 or for statistical purposes, and the processing is in the public interest.
- e. For criminal offence data, we will only collect and use it where the law allows us to do so and in accordance with data protection law.

5. Collecting this information

- a. While in most cases you must provide the personal information we need to collect, there are some occasions where you can choose whether or not to provide the data.
- b. We will always tell you if you have a choice. If you must provide the data, we will explain what might happen if you don't.
- c. Most of the data we hold about you will come from you, but we may also hold data about you from:
 - Local authorities
 - Government departments or agencies
 - Police forces, courts, tribunals
 - Medical professionals
 - Your representatives
 - Your family members
 - Your employer

6. How we store this data

- a. We keep personal information about you during our contact with you. We may keep it after our contact has ended, if this is necessary.
- b. We have a Data Retention Schedule which explains how long we must keep certain categories of information.
- c. We have security measures in place to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed.
- d. We will dispose of your personal data securely when we no longer need it.

7. Who we share your information with

- a. We do not share information about you with anyone outside of the Trust without permission from you unless the law and our policies allow us to do so.
- b. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with others such as:
 - Your family – for example where we need to protect your vital interests in the case of an emergency.
 - Your representatives – for example where you have a representative acting on your behalf.
 - Local authorities – to meet our obligations to share certain information with it, such as safeguarding concerns.

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- Government bodies such as Department for Education (DfE) – to meet our legal obligations and acting in the public interest regarding the education of young people.
- Our regulator, Ofsted, to comply with our legal obligations and in the public interest to provide education services.
- Police forces, Courts and Tribunals – fulfilling our legal obligations to prevent crime, assist investigations or comply with court orders etc.
- Our suppliers and service providers such as catering services, security services, IT services, software and online applications, payment providers – to enable them to provide the service we have engaged them for in line with our contractual obligations.
- The Trust’s auditors – to meet our legal obligations of having internal and external audits.
- Health authorities such as the NHS – to protect your vital interests.
- Professional advisors and consultants – acting under the public interest in providing educational support and consultancy.

8. Transferring data internationally

- a. Where we transfer personal data to a country or territory internationally, we will do so in accordance with data protection law.

9. Your rights - How to access personal information that we hold about you

- a. You have the right to make a ‘subject access request’ to gain access to personal information that we hold about you.
- b. If you make a subject access request, and if we do hold information about you, we will (unless there is a good reason why we shouldn’t)
 - 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 (decisions made by a computer or machine, rather than by a person), and any consequences of this.
 - Give you a copy of the information in a form you can understand.
- c. You may have the right for your personal information to be shared electronically with another organisation in certain circumstances.
- d. If you would like to make a request, please contact us (see “Contact Us” below). You can also read the information set out in the Trust’s Data Protection Policy and the Subject Access guidance on our school websites where you will find a Subject Access Request Form. You are not required to use the form, but by doing so, it helps us to deal with your request more efficiently.

10. Your other rights regarding your data

- a. Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:
 - object to the use of your personal data if it would cause, or is causing, damage or distress;
 - stop it being used to send direct marketing;
 - object to decisions being taken by automated means (by a computer or machine rather than by a person);
 - have the personal data we hold about you rectified if it is inaccurate or incomplete;
 - restrict our processing of your personal data (i.e. permitting its storage but no further processing);
 - seek redress, either through the Information Commissioner’s Office or through the Courts.
- b. To exercise these rights, please contact us (see “Contact us” below).

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11. Complaints

- a. We take any complaints about our collection and use of your 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 let us know first.
- b. To make a complaint, please contact our Data Protection Officer (see “Contact us” below).
- c. 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
 - Write to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

- a. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:
 - **Data Protection Officer:** Jo Townsend
 - **Email address:** DPO@Russelleducationtrust.org.uk
 - **Address:** Data Protection Officer, Russell Education Trust, 1 Park Road, Teddington, TW11 OAP. Please mark private and confidential for the attention of the Data Protection Officer.