Privacy Notice for Visitors and Contractors

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This privacy notice describes how we collect and use personal information about your during and after your visit with us, in accordance with the UK data protection law.

UK data protection law currently comprises the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025, each as amended from time to time.

Following the UK's departure from the European Union, the UK GDPR forms part of the domestic data protection framework. The UK GDPR sits alongside the Data Protection Act 2018 and the Data (Use and Access) Act 2025, which supplement and tailor the UK data protection regime, including provisions relating to regulatory powers, enforcement and specific processing activities.

The EU General Data Protection Regulation (Regulation (EU) 2016/679) continues to apply within the European Union and is referred to in this notice as the "EU GDPR" where relevant.

It applies to all current and former visitors and contractors.

Who Collects this Information

The Aurora Group 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 sites (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;
- Payment Details;
- Photographs for identification purposes for the duration of your visit;
- CCTV footage captured by the site.

How we Collect this Information

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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 only use your personal information when the law allows. This usually happens in these situations:

- **To provide services to you:** For example, managing your visit or volunteer activities.
- **To comply with the law:** Such as health, safety, or employment regulations.
- **For public or official purposes:** When required to carry out official tasks or serve the public interest.
- **For our legitimate interests:** We sometimes process data to:
  - Keep everyone safe and secure
  - Protect our property and assets
  - Prevent fraud or misuse of our services
  - Organise and improve our volunteer and visitor activities
- **For recognised legitimate interests under the DUAA 2025:** In line with the Data (Use and Access) Act 2025, we may also use information when necessary for:
  - Preventing or investigating crime
  - Safeguarding vulnerable people
  - Responding to emergencies
  - Protecting national or public security
  - Supporting public bodies with official tasks
- **With your consent:** If you have agreed to it, we will use your personal information in the ways you have allowed.

The situations in which we will process your personal information are listed below:

- Ensure the safe and orderly running of the service;
- 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

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- To defend the Service 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") require 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 reasons of public health;
- 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;
- other schools/services within the Aurora Group];
- Law enforcement officials such as police, HMRC;
- LADO;
- Professional advisors such as lawyers and consultants;
- Support services;
- 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.

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Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the Aurora Group 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.

We will retain and securely destroy your personal information in accordance with our data retention policy. This can be provided upon request.

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

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

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 and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- 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.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the Data Protection Officer in writing.

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)

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 contact the Data Protection Officer. 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.

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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 you can contact the DPO on the details below:

Data Protection Officer: Marie Turner
Email: marie.turner@the-aurora-group.com

How to Raise a Concern

If you have any concerns about how we handle your personal data, we encourage you to contact us in the first instance so we can try to resolve the issue.

You have the right to make a complaint at any time to the Information Commissioner's Office, 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 Commissioner's Office, 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.

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