



Visitors Privacy Notice

To be reviewed on an annual basis by the Trust Board

History of Document

Issue No	Author	Date Reviewed	Approved by Trust Board	Comments
1	DPO	1/5/18	-	1 st issue
2	DPO	12/7/18	-	cctv
3	DPO	20/8/20	-	Covid-19 track and trace
4	DPO	23/11/20	17/12/20	Overview, withdrawal of consent, international transfers, complaints

Overview

We are required by data protection law to provide the information in this Privacy Notice. This privacy notice explains how we collect, store and use personal data about individuals visiting our schools.

It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation came into force. We may update this Privacy Notice at any time.

Data Controller

The Active Learning Trust is the “controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

Our Data Protection Officer is Mrs Caroline Driver - email: dataprotection@activelearningtrust.org. As Data Protection Officer, they are responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations. They also act as your first point of contact if you have any questions or concerns about data protection.

What is Personal Data?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual’s actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, biometric or genetic data that is used to identify an individual is known as special category data. (The rest is ordinary personal data).

Visitors

This privacy notice is aimed at occasional and professional visitors who are required to sign in using the school’s visitors management system.

Categories of Visitors Personal Data we process

We process personal data relating to those visiting our schools and the Trust's registered office.

Personal data that we may collect, use, store and share (where appropriate) about you includes, but is not restricted to:

- First name and surname
- Company
- Photograph
- Vehicle registration
- Name of host/person visiting
- Information about business and pecuniary interests
- Time signed in and out
- If a regular professional visitor evidence that the individual holds an Enhanced Disclosure and Barring Service certificate
- IT device name, browsing history
- CCTV images captured in school

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

- Disability, health and access requirements

Why we use this Personal Data

The purpose of processing this data is to help us run the school, including to:

- Identify you and safely evacuate the school in the event of an emergency
- Meet statutory obligations for Safeguarding
- Ensure that appropriate access arrangements can be provided for visitors who require them
- Protect the school buildings and site
- To protect our school IT network
- Protect the safety of visitors to our school
- Comply with the law regarding data sharing

Collecting and using Personal Data in this way is lawful because:

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation to which the Trust is subject, for example our legal duty to safeguard pupils

- Carry out a task in the public interest
- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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.

Withdrawal of Consent

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

How we store Personal Data

Personal Data that we collect is stored in line with our Records Management Policy. The information held is kept secure and is only used for the purposes directly relevant to visit to one of the Trust's schools.

We maintain a visitor management system to store personal information about all visitors. The information contained in this system is kept secure and is only used for purposes directly relevant to work with the school.

Your personal data may be held on the school's Single Central Record (for regular visitors who provide a service – e.g. speech therapists, EP, cleaners etc)

When your relationship with the Trust has ended we will retain and dispose of your personal data in accordance with our Records Retention Policy.

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 visitors with:

- Our local authority – if we have any concerns over safeguarding
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as visitor management systems
- Police forces, courts – to assist them discharging their legal duties
- Security organisations – to ensure the safety and welfare of pupils, staff and visitors
- Emergency Services – to ensure the safety and welfare of visitors and to meet any legal obligations and to ensure the safety of the whole school community

- NHS - NHS/Public Health Agencies where relevant to the COVID pandemic as part of the Test and Trace Scheme.

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. We currently transfer personal data outside the EEA as we store personal data on cloud systems based in the EEA that have backup systems that may sometimes be located outside the EEA.

How long we keep your personal information

We only keep your information for as long as we need it or for as long as we are required by law to keep it. Full details are given in our Records Retention Policy which can be found on our website.

Your rights

You have the right to:

- Ask for access to your personal information
- Ask for rectification of the information we hold about you
- Ask for the erasure of information about you
- Ask for our processing of your personal information to be restricted
- Object to us processing your information.

If you want to use your rights, for example, by requesting a copy of the information which we hold about you, please contact the Trust's Data Protection Officer as follows:

Email: dataprotection@activelearningtrust.org

More information about your rights is available in our Data Protection Policy which is on our website <https://www.activelearningtrust.org/about/information-governance>

Complaints/Concerns

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 our Data Protection Officer in the first instance.

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 (local rate)
- Call 01625 545 745 (national rate)
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact

If you would like to discuss anything in this privacy notice, please contact the Trust's Data Protection Officer [dataprotection@activelearningtrust.org]