

# The Active Learning Trust

## Visitors Privacy Notice

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 **Highfield Ely or Highfield Littleport Academies**.

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 amended 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 (DPO) Service is provided by the Cambridgeshire ICT Service. As DPO, 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. The email contact is: [dpo@theictservice.org.uk](mailto:dpo@theictservice.org.uk)

### 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, where installed

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)

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.

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 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.

We do not transfer your personal data outside Europe.

## **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 DPO: [dpo@theictservice.org.uk](mailto:dpo@theictservice.org.uk)

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

If at any time you are not happy with how we are processing your personal information, then you may raise the issue with the Trust's Data Protection Officer 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) or 01625 545 745 if you prefer to use a national rate number.