

# PRIVACY NOTICE - Visitors

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## VERSION CONTROL

Version No:	Type of change	Date	Revisions from previous version
0.1	New document	Jan 2023	New Document
0.2	Interim review	Mar 2023	Contact details for DPO updated.
0.3	Amendment	May 2023	Changed to bi-annual review frequency
0.4	Bi-annual review	Sept 2024	Date changes only

# TABLE OF CONTENTS

VERSION CONTROL	1
TABLE OF CONTENTS	2
1. POLICY STATEMENT	3
2. PROCESS FOR COMPLIANCE AND IMPLEMENTATION	3
2.1 The Personal Data We Hold	3
2.2 Why We Use This Data	3
2.3 Use Of Personal Data In Automated Decision Making And Profiling	3
2.5 Our Basis For Using Special Category Data	4
2.6 Collecting This Information	4
2.7 How We Store This Data	4
2.8 Data Sharing	5
2.9 Transferring Data Internationally	5
3. RESPONSIBILITIES	5
3.1 How to access personal information we hold about you	5
3.2 Your other rights regarding your data	5
4. COMPLAINTS	5
5. CONTACT US	6

# 1. POLICY STATEMENT

- a. Under UK data protection law, individuals have a right to be informed about how the Academy and City Learning Trust uses any personal data held about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.
- b. This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.
- c. We, The City Learning Trust, High Lane, Burslem, Stoke on Trent, ST6 7AB is the 'data controller' for the purposes of UK data protection law.
- d. Our Data Protection Officer is Nathan Legg (see 'Contact us' below).
- e. The Academy Headteacher/Principal acts as the representative of the data controller, in their Academy, on a day-to-day basis.

# 2. PROCESS FOR COMPLIANCE AND IMPLEMENTATION

## 2.1 The Personal Data We Hold

- a. We process data relating to those who visit our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
  - i. Name.
  - ii. Contact details (address, company details, telephone numbers, email address)
  - iii. Vehicle type and registration number
  - iv. Documentation need for identification checks: x 3 including photographic ID
  - v. Details regarding any near misses or accidents on site which may occur whilst you are on site, involving you directly and/or as a witness
  - vi. Data about your use of the Academy's information and communications system
  - vii. Business & Pecuniary interests
- b. 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):
  - i. Race, ethnicity
  - ii. Disability and access requirements
  - iii. Information about any health conditions that we may need to be aware of
  - iv. Photographs and CCTV images captured in school
- c. We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.
- d. We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

## 2.2 Why We Use This Data

- a. The purpose of processing this data is to help us run the Academy, including to:
  - i. Establish and maintain effective visitor records using Inventory systems
  - ii. Meet statutory obligations for Keeping Children Safe in Education, facilitating our safeguarding obligations towards pupils/students.
  - iii. Ensure that appropriate access arrangements can be provided for visitors who require them
  - iv. Maintain a secure and safe working environment.

## 2.3 Use Of Personal Data In Automated Decision Making And Profiling

- a. We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object.

## 2.4 Our Lawful Basis For Using This Data

- a. We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:
  - i. Fulfil a contract we have entered into with you
  - ii. Comply with a legal obligation
  - iii. Carry out a task in the public interest

- b. Less commonly, we may also use personal information about you where:
  - i. You have given us consent to use it in a certain way
  - ii. We need to protect your vital interests (or someone else's interests)
  - iii. We have legitimate interests in processing the data – for example, where we monitor electronically visitors' arrival and departure to and from the School
- c. 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.
- d. 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.

## 2.5 Our Basis For Using Special Category Data

- a. For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:
  - i. We have obtained your explicit consent to use your personal data in a certain way
  - ii. We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
  - iii. We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
  - iv. The data concerned has already been made manifestly public by you
  - v. We need to process it for the establishment, exercise or defence of legal claims
  - vi. We need to process it for reasons of substantial public interest as defined in legislation
  - vii. We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
  - viii. 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
  - ix. We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.
- b. For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:
  - i. We have obtained your consent to use it in a specific way
  - ii. We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
  - iii. The data concerned has already been made manifestly public by you
  - iv. We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
  - v. We need to process it for reasons of substantial public interest as defined in legislation

## 2.6 Collecting This Information

- a. While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.
- b. Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.
- c. Most of the data we hold about you will come from you, but we may also hold data about you from:
  - i. Current employer
  - ii. Local Authorities
  - iii. Government departments or agencies
  - iv. Police forces, courts, tribunals

## 2.7 How We Store This Data

- a. Personal data is stored in accordance with our Data Protection Policy and Records Management Policy. We maintain a file to store personal information about all Trustees, Governors and volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the Trust member Academies.
- b. When your relationship with the Trust and member Academies has ended, we will retain and dispose of your personal information in accordance with our Records Management Policy which is available from our website or by contacting the City Learning Trust Data Protection Officer.
- c. We will dispose of your personal data securely when we no longer need it.

## 2.8 Data Sharing

- a. 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.
- b. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:
  - i. Government departments or agencies – to meet our legal obligations to share information about visitors to our sites.
  - ii. Our local authority – to meet our legal obligations to share certain information.
  - iii. Suppliers and service providers to enable them to provide the service we have contracted them for, such as provision of meeting refreshments/dietary requirements
  - iv. Police forces, courts to meet our obligation to share certain information.
  - v. Emergency services to assist in the event of a medical emergency
  - vi. The Department for Education to meet our legal obligation to share certain information
  - vii. Ofsted to meet our legal obligation under Section 5 and Section 8 of the Education Act 2005
  - viii. Security organisations to meet our legal obligation to ensure your safety and wellbeing in school.
  - ix. Our auditors
  - x. Professional advisers and consultants

## 2.9 Transferring Data Internationally

- a. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with UK data protection law.

## 3. RESPONSIBILITIES

### 3.1 How to access personal information we hold about you

- a. Individuals have a right to make a '**subject access request**' to gain access to personal information that the Trust and the Academy holds about you.
- b. If you make a subject access request, and if we do hold information about you, we will:
  - i. Give you a description of it
  - ii. Tell you why we are holding and processing it, and how long we will keep it for
  - iii. Explain where we got it from, if not from you
  - iv. Tell you who it has been, or will be, shared with
  - v. Let you know whether automated decision-making is being applied to the data, and any consequences of this
  - vi. Give you a copy of the information in an intelligible form
- c. You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.
- d. If you would like to make a request, please contact our Data Protection Officer.

### 3.2 Your other rights regarding your data

- a. Under UK data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:
  - i. Object to the use of your personal data if it would cause, or is causing, damage or distress
  - ii. Prevent your data being used to send direct marketing
  - iii. In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
  - iv. Claim compensation for damages caused by a breach of the data protection regulations
  - v. In certain circumstances be notified of a data breach.
  - vi. Make a complaint to the Information Commissioner's Office
- b. To exercise any of these rights, please contact our Data Protection Officer.

## 4. COMPLAINTS

- a. We take any complaints about our collection and use of personal information very seriously.
- b. 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.
- c. To make a complaint, please contact our data protection officer.
- d. Alternatively, you can make a complaint to the Information Commissioner's Office:
  - i. Report a concern online at <https://ico.org.uk/concerns/>
  - ii. Call 0303 123 1113
  - iii. Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 5. 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**:

Nathan Legg  
City Learning Trust  
High Lane  
Burslem  
Stoke on Trent ST6 7AB

**Email: [dataprotection@citylearningtrust.org](mailto:dataprotection@citylearningtrust.org)**