

Community Academies Trust

Privacy Notice for Visitors – How we use your information

2021/22

Who are we?

Community Academies Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Community Academies Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA073240**

You can contact the Academy Trust as the Data Controller in writing at:

Community Academies Trust, Dimbleby House, Stoneydelph Primary School, Crowden Road, Wilnecote, Tamworth, Staffordshire. B77 4LS or datacontroller@communityacademiestrust.org

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them to manage the employment relationship. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our visitors.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about visitors?

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

- Name
- Contact details, e.g. email, telephone number, address.
- Information relating to the visit, e.g. visitors' company or organisational place of work, arrival and departure time, car registration.
- Biometric data and CCTV images/recordings
- Photographic images, e.g. for visitors' badges.
- Information about any access arrangements visitors may need.

How is your personal information collected?

We collect personal information about visitors from the following sources:

- You, the visitor.

- The company or organisation that you may be representing.

For what purposes do we use visitors' personal information?

We will use your personal information to:

- To identify you.
- To keep you safe whilst on the school site.
- To keep students and staff safe.
- To maintain accurate records of visits to the school.
- To identify who is on the site at any one time, e.g. in the event of an emergency, fire, accident/incident etc.

We need to process your personal data to ensure you are permitted to be on the school site. It is ultimately in our legitimate interests to process personal data for keeping records of this process. Actively controlling and processing this data allows the management of visitors to be efficient and safe.

Collecting visitor's information

The information you provide to us is provided on a voluntary basis to enable us to confirm that you have a legitimate reason for entering the school premises. In order to comply with the General Data Protection Regulation, we are informing you that you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information, these are as follows:

1) With the consent of the individual to whom that information 'belongs'

We can only process your personal information when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 1.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) To perform a public task

We are able to process personal information if it is necessary to do so in the performance of the Academy Trust's day to day responsibilities.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) For legitimate interests

We are able to process your information as it is necessary for your legitimate interests.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- 3) Processing relates to personal data which is manifestly made public by the data subject
- 4) Necessary for establishing, exercising, or defending legal claims
- 5) Necessary for reasons of substantial public interest
- 6) Necessary for preventative or occupational medicine, or for reasons of public interest in the area of public health
- 7) Necessary for archiving, historical research, or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the table attached.

Who might we share your information with?

We may share visitor information with members of our staff, directors, and governors.

Appropriate security measures have been put in place to prevent personal information being accidentally lost, used, or accessed in an unauthorised way.

We will not share your data with third parties unless it is essential for us to do so. They will only process personal information on our instruction and are subject to a duty of confidentiality.

Procedures are also in place to deal with suspect data security breaches, and you will be notified of a suspected breach where we have a legal obligation to do so.

What do we do with your information?

All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. The Community Academies Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

How long do we keep your information for?

In retaining personal information, the Community Academies Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Community Academies Trust are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolToolkit>

Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, visitors have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at enquiries@communityacademiestrust.org or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

**** Please ensure that you specify you are requesting personal information that Community Academies Trust holds and which school or schools within the Trust you have visited.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be reviewed in **October 2022**.

Table 1 – Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

| Information Type | Special Category – additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|---|--|---|----------------------------------|
| <ul style="list-style-type: none"> • Name • Address • Telephone number • Email address • Company or organisation you may represent • Car registration details • CCTV images • Photographic images | | <ul style="list-style-type: none"> • The local authority The Department for Education • Educators and examining bodies • Our regulators (e.g. Ofsted and CQC) • Suppliers and service providers • Central and local government • Our auditors • Health authorities Health and social welfare organisations • Professional advisers and consultants • Charities and voluntary organisations • Police forces, courts, tribunals • Professional bodies • The organisation/company you are representing • Emergency services | Consent |
| <ul style="list-style-type: none"> • Information relating to access requirements | Consent | <ul style="list-style-type: none"> • Emergency services | |

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|--|--|--|----------------------------------|
| <ul style="list-style-type: none"> • Name • Address • Telephone | | Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips | Vital Interests |

Table 3 - Personal information we are required to process because it is necessary to do so in order to perform a public task

| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information | Lawful reason for sharing |
|--|--|---|----------------------------------|
| Information relating to Covid – 19 testing: Name Date of birth Year Group Parent contact number Results of Covid – 19 testing | Necessary for reasons of public health | Public Health and other public health agencies | Public task |

Table 4 – Personal information we are required to process as it is necessary for your legitimate interests

| Information Type | Special Category – additional lawful reason | Third parties with whom we share the information | Lawful reason for sharing |
|---|--|---|----------------------------------|
| <ul style="list-style-type: none"> • CCTV images | | <ul style="list-style-type: none"> • Police • External security providers | Legitimate Interests |