



Privacy Notice for Visitors **General Data Protection Regulation**

Charnwood Primary Academy's Commitment to Data Privacy

Charnwood Primary Academy is committed to protecting the privacy and rights of anyone who chooses to share their personal data with us. Under data protection law, individuals have a right to be informed about how we use any personal data we hold about them and we comply with this right by providing 'privacy notices' (sometimes called fair processing notices) to individuals where we are processing their personal data. Individuals can find out more information about the UK GDPR [here](#).

This privacy notice explains what personal information the Academy collects and holds about visitors. It explains why we hold this information, what we do with it, how long we keep it for and if we share it with third parties.

The Academy is the Data Controller for the personal information you provide to us. This means that we determine the purposes for which, and the manner in which, any personal data relating to visitors is to be processed in order to comply with legal obligations and legitimate interests (in accordance with Article 6 of the UK GDPR) as a public sector organisation. The personal data collected is essential, in order for the Academy to fulfil its official functions.

A data protection representative for the Academy, Katie Stanley, can be contacted on 01543 227560 or headteacher@charnwood.staffs.sch.uk in the first instance for any queries in relation to the processing of your personal data.

Staffordshire University Academies Trust has a Data Protection Officer whose role is to support the Trust and its' Academies with data processing practices. The DPO can be contacted on 01782 987120 or hkirkham@suatrust.co.uk.

The information you provide will be used in accordance with the Staffordshire University Academies Trust data protection policies can be found by accessing the Trust's website - <http://www.suatrust.co.uk/documents---policies>.

The personal data we process

The personal information that the Academy collects regarding visitors will be utilised to meet our statutory duties and to fulfil our purpose as a public sector organisation.

We process data relating to those who visit settings within the Trust. Personal data that we collect, use, store and when appropriate, share, about you includes but is not restricted to:

- Name

- Organisation
- Telephone number
- Time on and off site
- DBS number and date (where relevant)
- Identification
- Vehicle registration
- CCTV (whilst onsite)
- Training and competency (where relevant)

Visitors' personal data will be sought from the data subject themselves. Third parties will be contacted to obtain visitors' personal data with the data subject's consent, unless the Academy has a legal basis for doing so.

Why we use this data

The Academy will request identification from visitors on arrival. Copies of identification will not be required but will be used to verify the identity of the visitor by suitable means. To enable us to safeguard our pupils, in accordance with the nature of the visit, DBS data will also be verified on arrival of the visitor in accordance with the latest Keeping Children Safe in Education guidance. No copies of DBS certificates will be taken.

The Academy collects the individual's name, company name, vehicle registration and times of the visit to fulfil the Academy's legal duty to safeguard pupils and staff to ensure they are safe in the workplace, visitors have been approved to enter the premises and are identifiable.

This data is also used to ensure that the Academy is able to adhere to health and safety requirements, ensure visitors are safe on Academy premises and particularly to ensure that they can be safely evacuated from the building and registered at the evacuation point in the case of an emergency.

Where the visit requires and as relevant to the purpose of their visit, the Academy will check the competency of the individual attending site, to ensure that they are appropriately trained to conduct the services they are contracted for on Academy premises.

CCTV recordings are used for public safety interests and the prevention and detection of crime. Recordings also provide enforcement agencies with evidence of criminal activity, for formal actions including prosecutions in court and identification of offenders in investigations. These recordings contain images of individuals utilising the Academy grounds / building and the legal basis for using the information you provide us is:

- For the interest of staff, pupil and public safety, the prevention and detection of crime, apprehension and prosecution of offenders and for legal proceedings
- The processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law

The CCTV database is used to record incidents that are actioned by designated staff with secure access to the system. This information can be used as an evidential log if needed for legal purposes, to internally investigate an accident or incident which may be shared with our governing body, as well as for the Staffordshire Police, Health and Safety Executive as required.

The Academy may use their signing in system to take a photograph of visitors in order to produce an identification badge for the visitor to use whilst they are on the premises. This pass is used for safeguarding purposes to ensure that staff and pupils can identify that the visitor has signed in and been approved to enter the building. Visitors will be required to securely dispose of this pass on departure from the building.

The Academy has Wi-Fi on site for the use of visitors and where the use of WiFi is required for the visit, will provide the visitor with the relevant login information.

Through use of the WiFi system the Academy requires visitors to adhere to the Acceptable Use Policy. We record the device address and will also log traffic information in the form of sites visited, duration and date sent/received. The purpose for processing this information is to provide you with access to the internet whilst visiting our site and to protect our systems and network from cyber security risks associated with third party devices.

We may also use information about you that falls into "special categories" of more sensitive personal data. This includes information about disability, health and access requirements where applicable, to ensure that appropriate access arrangements can be provided for visitors who require them. This data will be verified prior to arrival at the Academy where a visitor has particular health or access requirements that the Academy must support for the duration of the visit.

Our lawful basis for using this data

The data of visitors is essential for the Academy's operational use to facilitate keeping children safe in education and ensure that the safety of visitors is maintained within the setting. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

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 (Article 6(1)c)
- Carry out a task in the public interest (Article 6(1)e)
- Legitimate interest (Article 6(1)f)

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way (Article 6(1)a)
- We need to protect your vital interests, or someone else's vital interests (Article 6(1)d)

We collect data which is specified under the General Data Protection Regulation as Special Category Data, known as data that could be considered particularly sensitive. This means that, under the UK GDPR, we have obligations to keep this data secure and use it where:

- We have explicit consent (Article 9(a))
- Where we need to protect the vital interests of an individual (Article 9(c))
- We have a legitimate interest as a not for profit organisation (Article 9(d))
- For the safeguarding of children and individuals at risk (Paragraph 18, Schedule 1, Data Protection Act 2018)

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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us 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 Academy's use of your data.

How we store this data

For visitors who are visiting the Academy on behalf of an organisation, your personal data may be sought directly from your employer; namely your name, confirmation of competency for the purpose which you are visiting and confirmation of appropriate DBS clearance as detailed within this document. This data will be used to verify eligibility to attend site prior to the visit, in advance of attendance.

Once your visit has been completed we will retain this file and delete the information in it in accordance with our Compliant Records Management Policy. Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

The Academy will not share your personal information with any third parties without your consent, unless the law allows us to do so. 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.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information.

Who we share volunteer information with

Where it is legally required, or necessary for another reason permitted under data protection law, we may share personal information about you with:

- Our local authority, Staffordshire County Council – to meet our legal duties to share certain information with it, such as health and safety purposes.
- The Department for Education (a government department).
- Suppliers and service providers, including professional bodies, professional advisers and consultants – so that they can provide the services we have contracted them for.
- Our auditors – to ensure that we comply with finance, data protection and health and safety.
- Police forces, courts, tribunals – to ensure the Academy meets legal requirements.
- Medical/Paramedic Services - Incidents relating to the safety of the building occupants requiring medical/paramedic/ambulance services.

Data Retention

Personal data is retained in line with the Staffordshire University Academies Trust Compliant Records Management Policy.

Personal information will be retained depending on the nature of the information. Data will only be retained for as long as is necessary to fulfil the purposes for which it was processed, and will not be retained indefinitely.

If you require further information regarding retention of data, and the periods for which your personal data is held for, please download our Compliant Records Management Policy from the Trust website <http://www.suatrust.co.uk/documents---policies> or request a copy from the Academy's Data Protection Representative.

Your rights

- Individuals have a right to make a 'subject access request' to gain access to personal information that the Academy holds about them. A request can be made to the Academy's Data Protection Representative, whose contact details can be found within this Privacy Notice. If you would like to make a request, please find a link to the information to the supporting information [here](#).
- You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

Individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

To exercise any of these rights, please contact our Data Protection Representative.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you have any queries in relation to our processing, or think that our collection or use of personal information is unfair or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by contacting our Data Protection Officer:

Email – hkirkham@suatrust.co.uk

Telephone – 01782 987120

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
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Further information

If you require further information about how we use your personal data, please visit our website, <https://www.charnwood.staffs.sch.uk/>.