

Privacy Notice – Visitors

Date: Aug 2024

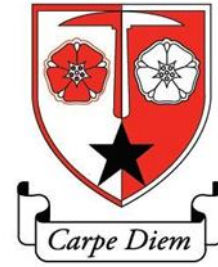
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Document owner: Audenshaw School

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Introduction

Audenshaw School must collect and process personal information (data) about you when you visit our site in order to effectively manage your visit and to meet the legal obligations placed upon us as an organisation and education provider.

This privacy notice outlines what data we collect about you when you visit our site, why we need it and how it is used. The school process all personal data in accordance with the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act (2018)

Data Controller

The school is the 'Data Controller' for the personal information that we process about you. This means that we are responsible for your data and make decisions on how it is used.

Data Protection Officer

The school has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the school and acts as the first point of contact for any questions or queries regarding data protection. Our DPO is Mrs Monks who can be contacted on:

T: 0161 336 2133 | E: monkss@audenshawschool.org.uk

What personal data do we process about you, where we get it and why we need it?

All visitors to the school site must provide us with the following information upon arrival to help us meet our safeguarding and health & safety obligations.

All Visitors

All visitors to site will directly input the following information into the electronic visitor screen at reception:

- Full name to identify who you are.
- Contact details to correspond with you.
- The reason for your visit to verify the legitimacy of your attendance.
- Entry and exit times to meet our health and safety obligations if there is a fire or other emergency.
- Vehicle registration to effectively manage our parking provision and ensure only permitted cars are on site.

Once the above information is inputted, an image of you will be taken and printed onto an ID badge that you must wear for security and safeguarding purposes.

Depending upon the nature of your visit, we will ask you to provide us with the following information:

- A DBS certificate to meet our safeguarding requirements and ensure we comply with the statutory duties placed upon us as a school. We log your reference number and date of check only; we do not keep a copy of your DBS certificate.

CCTV

Closed Circuit Television (CCTV) is in place at the school site; the system will capture images of you when you visit us. CCTV helps us to ensure site security and supports in the prevention and detection of crime.

Incidents & Accidents

If an incident or accident occurs on site that you are party to, we will record the details to meet our health & safety and safeguarding obligations. Examples include completing accident forms and reporting more significant incidents to the emergency services and relevant governing bodies.

Lawful Bases and Purposes for Processing

Under the UK-GDPR, the school must have a lawful basis to process your personal data. Your data is primarily processed as the school has a **legal obligation** that requires us to process it, namely:

Single Central Record

The Department for Education (DfE) statutory guidance on safeguarding 'Keeping Children Safe in Education' states that all schools must produce and maintain a record of vetting checks for certain visitors and contractors attending and working on site. Details of visitors where necessary will be logged on the schools 'single central record' (SCR). The school must log basic identifiers such as name, contact details and reason for visit along with the dates and reference numbers of the relevant vetting checks.

Health & Safety

The school has a duty to keep a log of who is on site to keep you and other members of the school community safe under health and safety law and the fire safety regulations we must adhere to; if there is a fire or accident on site, we need to be aware of your presence on site.

Legal Claims

In the event that the school is subject to a legal claim to which you are a party to, we may need to process your personal data in the enactment or defence of that claim. For instance, if an accident or incident has taken place involving you.

Further lawful bases...

We use CCTV to enhance site security, keep members of the school community safe and to aid in the prevention and detection of crime. We are **performing a task in the interest of the public**.

In the unlikely event of an accident or incident on site that involves you, we may need to process your personal data in the act of protecting or saving your life or that of another person. For instance, if we provide your name and contact details to the emergency services. In such scenarios, we have a **vital interest** to process your personal data.

Special Category Data

The school does not routinely process 'special category data' about you when you visit our site. Special category data is information that is much more sensitive in nature and therefore requires extra protection. Examples include details about your health and wellbeing and special characteristics like gender, religion and ethnicity.

It is only anticipated that the school will process special categories of personal data about you if the following scenarios occur:

- An accident or incident occurs whilst you are on site, and we must fill out an accident form or process your data in the act of providing you with assistance.
- You inform us of any specific medical conditions or requirements that we need to be aware of to ensure we can accommodate your visit accordingly.

In such cases we are processing your personal data under the following lawful basis in respect of your special category data:

- **Substantial public interest:** we are processing your special category data to support you and meet our statutory obligations under the Health & Safety at Work Act (1974) and Equalities Act (2010).

Less commonly, we may need to rely upon the following lawful basis to process your special category personal data if the school is subject or party to a legal claim involving you:

- **Legal claims and judicial acts:** we must process your special category personal data to fulfil court proceedings, obtain legal advice or establish or defend our legal rights in any way.
- **Substantial public interest (insurance):** we need to share details of an accident or injury with our insurers.

Who we share your personal information with?

The school will only share your personal data if it is required to meet a legal obligation or an operational duty relating to visitor management.

The school routinely share visitor data with the provider of our electronic visitor management system which you will input your data directly into upon arrival at our reception.

We may share your personal data with external auditors who ensure good record keeping compliance. Auditors will typically attend site and your data will not be transferred out of the school.

If there is a significant accident or incident that you are party to whilst on school site, we may share your personal information with the following:

- Local Authority
- Police
- Emergency Services
- Governing Bodies (HSE, ICO etc)
- Professional Advisors
- Insurance Provider
- Courts

The school perform strict checks on those third parties with whom we share your data to ensure they are compliant with data protection legislation and meet the same high standards of security as expected by the school.

If we must share data, we take a minimalist approach to ensure only the necessary amount of information is provided. Data will not be transferred unless there is a secure method of exchange.

Do we transfer your data internationally?

The school do not routinely transfer visitor data outside of the United Kingdom, however some of the third parties with whom we share your personal data may store data on international servers. In such circumstances, we will ensure the relevant safeguards are in place and data protection standards are complied with fully.

How we store and how long we keep your personal information?

To comply with the UK-GDPR, the school only keep personal data for as long as necessary to meet our legal and operational duties.

Our 'Records Management Policy & Retention Schedule' (available at our school office) outlines how long visitor records are kept and how we determine and manage these periods. As a rule of thumb, general visitor data will be kept for up to 12months.

Your personal data is stored securely on site. Records kept in electronic format are stored securely on carefully selected databases and systems that are fully encrypted with password protection and two factor authentication utilised where available. Any physical records are kept in locked cabinets within locked offices and archive rooms; key access is strictly limited depending upon role.

School staff and those third parties accessing key pupil records are subject to DBS checks and strict confidentiality agreements.

What are your rights?

Under the UK-GDPR, you have a right to access the personal data that we hold about you by making a subject access request (SAR). If you make a SAR and we do process the data you have requested access to, we will:

- Give you a description of it.
- Explain why we are processing it and how long we will hold it.
- Explain where we collected the data if not from you.
- Outline if the data has been or will be shared with any other parties.
- Inform you if any automated decision making has been applied to the data and provide any consequences of this.
- Provide you with a copy of the data in an intelligible form.

Along with the right to access your personal data, you also have the following rights under the UK-GDPR:

- The right to ask us to rectify any personal information you feel is inaccurate or incomplete.
- The right to ask us to erase your personal data in certain circumstances.
- The right to ask us to restrict the processing of your personal data in certain circumstances.

- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to transfer the personal data you provided to another organisation in certain circumstances.

If you would like to exercise any of your rights, please contact the school office in the first instance.

A response will be provided to you within one calendar month. The school reserves the right to extend the response time by a further two calendar months if your request is complex, we will however inform you of any intention to extend within the first month.

Complaints

If you have any concerns at all about how we process your personal data, please contact us in the first instance so that we can help resolve any issues.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113 | Website: <https://www.ico.org.uk>

Last Updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in August 2024.