

MELBURY PRIMARY SCHOOL

PRIVACY NOTICE FOR VISITORS AND VOLUNTEERS



Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals visiting the school, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. It is aimed at occasional and professional visitors to the school (*this does not include parents/carers of pupils visiting to settle their child in nursery or drop and collect their child/ren. Neither does it include parents/carers who come to the school office to pay monies or make enquires*).

We, Melbury Primary School, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer (DPO) is Carolyn Marshall (see 'Contact us' below).

The personal data we hold

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

- Name
- Contact details
- Date of birth, marital status and gender
- If a regular professional visitor evidence that the individual holds an Enhance Disclosure and Barring Service (DBS) certificate (disclosure number and issue date)
- Information relating to your visit, e.g. your company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes for the duration of your visit
- CCTV images captured in school
- Information about any access arrangements you may need
- Dates of visitors with vehicle registration numbers recorded on the visitor management system
- Premises log information (Names, DBS information - logging in/out - Inventory system)

This information may be held on our Single Central Record (SCR) if you visit on a regular basis in the capacity of working with children, staff or conducting work/duties on the premises.

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information (where applicable):

- Disability, health and access requirements

Why we use this data

We use this data to:

- Identify you and keep you safe while on the school site
- Keep pupils and staff safe and meet statutory obligations for Safeguarding
- Maintain accurate records of visits to the school
- Provide appropriate access arrangements

Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we need to:

- Comply with our legal obligation to process the data i.e. the use of photographs for identification in relation to Safeguarding (Keeping Children Safe in Education, September 2018)
- Carry out public interest

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing workforce information are:

- For the purposes of carrying out our duties as a maintained school in accordance with the legal basis of:
 - Article 6 1d) processing is necessary in order to protect the **vital interests** of the data subject or of another natural person;
 - Article 6 1f) processing is necessary for the purposes of the **legitimate interests** pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Less commonly, we may also process your personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect someone's vital interests (save your life, or someone else's)

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it 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 our use of your data.

Collecting this information

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information to us.

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.

How we store this data

We will keep your personal data while you are visiting our school.

We may also keep it beyond this, if necessary, to comply with our legal obligations.

Personal data is stored in line with our Records Management Policy. This is based on the *Information and Records Management Society's toolkit for schools*.

All information is stored in a secure manner.

We will dispose of your personal data securely when we no longer need it.

Data sharing

We do not share information about visitors with any third party without 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 – to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- Our regulator e.g. Ofsted, Independent Schools Inspectorate
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- GDPR and Data Protection compliance inspection audit
- Work Place Car Parking Department – Nottingham City Council
- Police forces, courts, tribunals
- The organisation/company you are representing

Your rights

How to access the personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our DPO.

Your other rights regarding your data

Under data protection law, 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 its processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our DPO.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our DPO, Carolyn Marshall , 0115 9155787.

Complaints

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

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.

To make a complaint, please contact our Data Protection Officer.

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

Author: Carolyn Marshall

December 2021

To be reviewed December 2022