

East Midlands Academy Trust

Privacy Notice Site Visitors 2024 - 2025

'Every child deserves to be the best they can be'

| Scope: East Midlands Academy Trust & Academies within the Trust | |
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| Version: V2 | Filename: Privacy Notice Site Visitors |
| Approval: May 2024 | Next Review: May 2025 <i>This Policy will be reviewed & approved by owner annually</i> |
| Owner: Head of Shared Services | |

| Policy type: | |
|--------------|-----------------------------------|
| Statutory | Replaces Academy's current policy |

Revision History

| RevisionDate | Revisor | Description of Revision |
|---------------|---------|--|
| V2 May 2024 | DU | Major change to coincide with moving to new DPO provider new privacy notice produced to ensure compliance with GDPR (UK) |
| V1 April 2021 | DU | New EMAT Data Retention Policy issued |

This document will be reviewed annually and sooner when significant changes are made to the law

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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1. Privacy Notice (How we use information)

East Midlands Academy Trust (EMAT) collect, hold, use and share information about our site visitors. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means the collecting, storing, using, sharing and disposing of it. We collect, hold and share personal information on site visitors.

For the purposes of Data Protection legislation EMAT is a data controller and is registered as such with the Information Commissioner’s Office.

2. The categories of site visitors that we process include:

- Personal identifiers, contacts and characteristics (such as name, contact details, address and photograph).
- Car registration.
- Use of school devices and school networks as part of our safeguarding procedures.
- CCTV Images.
- Safeguarding information.

We may also collect, use and store information about criminal convictions, offences and prohibitions. This information may have come from other organisations including former employers, Teacher Regulation Agency, social services and the Disclosure & Barring Service.

3. Why we collect and use site visitors information

The personal data collected is essential in order for the trust to fulfil their official functions and meet legal requirements.

We collect and use visitor information, for the following purposes:

- to meet the statutory duties placed upon us.
- to help us to deliver our responsibilities to our school community.
- to protect pupil and staff welfare.
- to protect the school buildings and site.
- to protect the safety of our visitors to our school.
- photographic images for identification purposes.

Under the General Data Protection Regulations (UK GDPR), the legal basis we rely on for processing personal information for general purposes are:

- Article 6(a) – Your consent (for any processing which does not fall into the other bases explained below.
- Article 6(c) - Compliance with our legal obligations.
- Article 6(e) – Carrying out tasks in the Public Interest.

Keeping Children Safe in Education 2023 (statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002 etc).

3.1 Marketing Purposes

Where you have given us consent to do so, we may send you marketing information by text message or email promoting school events, campaigns and or charities. You can withdraw this consent at any time by contacting us

3.2 Automated Decision Making & Profiling

We do not currently process any personal data through automated decision making or profiling. Should this change in the future, privacy notices will be updated to explain both the processing and your right to object to it.

4. How we collect site visitor information

We collect site visitor personal information primarily via our visitor management system where visitors will be directed to enter personal information and have a photograph taken.

We may also request Disclosure & Barring Service and photographic ID should we need to add a site visitor to our single central record.

Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with 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.

5. How, where and for how long we store site visitor information

We hold site visitor information securely on the Trust's IT network. This consists of a cloud based visitor management system with data held in the UK, protected by multi factor authentication but also CCTV recording systems. Secure storage is provided for paper based records.

We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention, please visit our [website](#).

We dispose of personal information securely when we no longer need it.

6. Who we share site visitor information with

We routinely share this information with

- Central and Local government – to meet our legal obligations.
- The Department for Education inc. Teaching Regulation Agency.
- Our Local Advisory Board.
- Our regulator, Ofsted.
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as our visitor management system.
- Financial organisations – to ensure we are meeting our legal obligations as regards the way in which we spend the school budget.
- The Disclosure and Barring Service.
- Our school community (via the school website).
- The central team in our Trust.
- Police forces, courts, tribunals – as and when needed, to meet any legal obligations and to ensure the safety of the whole school community.
- Security organisations – to ensure the safety and welfare of pupils, staff and visitors.

And external systems used by the school to carry out day to day processes and requirements. For example, and not limited to;

- SignIn App -Sign in and site access record.
- Social Media.

7. Why we share site visitor information

We do not share information about our site visitors with anyone without consent unless the law and our policies allow us to do so.

8. Local Authority

Where we are required to share information about school governance with our Local Authority, we do so under the terms of a Data Sharing Agreement

9. Freedom of Information Act 2000 and Environmental Information Regulations 2004

As a public body, our school is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws.

For example, we may receive a request asking about numbers and/or roles of governors.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

10. Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Office, the Headteacher or the Data Protection Officer.

You also have the right to:

- be informed about the collection and use of your personal data.
- rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete.
- erasure, often known as the 'right to be forgotten'; however, this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- restrict processing, although, as above this is a limited right.
- object; though other than for marketing purposes, this is also limited as above.
- Where we rely on your consent to process your data, you have the right to revoke that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know – our contacts are in Section 11 at the end of this document.
- You also have rights in relation to automated decision making and profiling, though these are not currently relevant.
- Finally, the right to seek redress, either through the ICO, or through the courts.

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions you, your representatives or regulators may have about it.

11. Contact

If you have any concern about the way we are collecting or using your personal data, would like to exercise your rights, or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the School Office, Headteacher or Data Protection Officer:

Data Protection Officer Name: Education Data Hub (Data Protection), Derbyshire County Council

DPO Email: dpforschools@derbyshire.gov.uk

DPO Phone: 01629 532888

DPO Address: County Hall, Smedley
Street, Matlock, Derbyshire, DE4 3AG

If however, you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number ZA044022 and stating that the Data Controller is East Midlands Academy Trust

Information Commissioners' Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

Website: <https://ico.org.uk/concerns/>