

# School Privacy Notice

## How we use Visitor Information



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 Visitors.

As a public body as we have appointed Grow Education Partners Ltd as its Data Protection Officer (DPO), the responsible contact is David Coy ( (see 'Contact us' below).

### **1. The personal data we hold**

We process data relating to those applying to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:

- Name
- Company/Institution Details
- Vehicle Registration Details
- Close Circuit Television Images (CCTV) images
- DBS Details
- Photo ID
- Contact details.

### **2. Why we collect and use this information**

The purpose of collecting and processing this data is to help us run the school efficiently, including but not limited to:

- Fulfil our legal obligations in relation to Keeping Children Safe in Education
- Inform our operational procedures
- To comply with the law regarding data sharing.

### **3. Our lawful basis for using this data**

This section contains information about the legal basis that we are relying on when handling your information.

These are defined under Data Protection legislation and for personally identifiable information are

- Processing is necessary to comply with the legal obligations of the controller.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

A full breakdown of the information we collect on visitors can be requested by contacting the Marily Troyano whose details can be found in the communication section at the end of this notice.

### **4. Storing your data**

Your data will be stored in both electronically and in paper. In line with our retention policy, your data will be held for 12 months, then removed and held in a secure filing system for a further 6 years.

### **5. Who we share information with**

In order for us to legally, effectively and efficiently function, we are required to share data with appropriate third parties, including but not limited to:

- Ofsted-during the course of a school inspection

- Security organisations- to create a secure workplace for all staff
- Our auditors, to ensure our compliance with our legal obligations
- Public Bodies; such as NHS England
- Professional advisers and consultants- for us to develop our services and best provide our public service
- Police forces, courts, tribunals and security services.

## 6. Your rights

### How to access 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
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form

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

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

### Your other rights regarding your data

- Withdraw their consent to processing at any time. (This only relates to data for which the school relies on consent as a lawful basis for processing.)
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, individuals are asked to preferably submit their request in written format to assist with comprehension.

If you would like to exercise any of the rights or requests listed above, please contact Marily Troyano:

- Marily.troyano@st-charles.rbkc.sch.uk
- 020 8969 5566
- 83 St Charles Square, London W10 6EB

We reserve the to verify the requesters' identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The school does not carry out any automated decision-making and/or profiling on the workforce.

## 7. Data Protection Breaches

If you suspect that yours or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction, or damage. Then we ask that you please contact the DPO or Marily Troyano.

## 8. 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, **David Coy** (contactable on david.coy@london.anglican.org, 020 3837 5145).

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

## 9. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our School Data Protection Lead, Marily Troyano, or our independent Data Protection Officer, **David Coy** (contactable on david.coy@london.anglican.org, 020 3837 5145).

## 10. Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.