



## Privacy Statement: Visitors

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## Document Control

<b>This document has been approved for operation within:</b>	<b>All Trust Establishments</b>
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## **THE BAY LEARNING TRUST**

### **VISITOR DATA PRIVACY STATEMENT**

#### **1 INTRODUCTION**

- 1.1 The Bay Learning Trust (the Trust) is committed to protecting the privacy and security of its pupils personal information. This Visitors Privacy Statement provides you with important information about what, how, where, why and when the Trust collects and Processes your Personal Data.
- 1.2 This statement should be read in conjunction with our Data Privacy Policy which contains more generalised information about our data protection procedures.
- 1.3 This privacy notice meets the requirements of the General Data Protection Regulation and the Data Protection Act 2018.

#### **2 ABOUT THIS NOTICE**

- 2.1 The Trust is what is known as the 'Controller' of the Personal Data you provide to us or which we collect from third parties. This means that Trust is responsible for deciding what personal information we gather and how we hold and use it.
- 2.2 The Trust is registered as a Controller with the Information Commissioner's Office and renews this registration annually. The Trust's registration number is 07588464.
- 2.3 The Trust processes your personal data in accordance with Data Protection law. This includes the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 2.4 This statement applies to all visitors to school premises and some members of the general public.

#### **3 WHAT IS PERSONAL DATA?**

- 3.1 Personal Data is any information that relates to an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly.
- 3.2 It also includes information relating to you, from which you cannot be directly identified, if you can be identified from that information when it is used in combination with other information we hold about you.
- 3.3 Personal Data can include information relating to you that has been 'pseudonymised', meaning that any information that directly or indirectly identifies you (e.g. your name) is removed and replaced with one or more artificial identifiers or pseudonyms (e.g. pupil number).
- 3.4 However, truly anonymous data, or data that has had any identifying information permanently removed from it, does not count as Personal Data.
- 3.5 When considering whether information 'relates to' you or your child for the purposes of Data Protection Legislation, we take into account a range of factors, including the content of the information, the purpose or purposes for which we are Processing it, and the likely impact or effect of that Processing on you.

## **4 WHAT TYPES OF PERSONAL DATA DO WE PROCESS?**

4.1 Any activity that involves the use of your personal data is referred to as Processing. The Trust Processes many different categories of pupil information. This may include;

- 4.1.1 personal identifiers and contacts (such as name, contact details and address);
- 4.1.2 information relating to your visit (such as your company or organisation name, arrival and departure time)
- 4.1.3 details of your representatives
- 4.1.4 vehicle registration details
- 4.1.5 photographs for identification purposes for the duration of your visit
- 4.1.6 CCTV images captured in school
- 4.1.7 information about any access arrangements you may need
- 4.1.8 information relating to safeguarding
- 4.1.9 correspondence with us (including complaints, suggestions and compliments)
- 4.1.10 information you may send us or enter onto our website
- 4.1.11 any information you choose to share with us

## **5 HOW DO WE COLLECT YOUR PERSONAL DATA?**

5.1 Most of the personal information the Trust collects is provided to us directly by you. We also collect your information via registration forms.

5.2 Most of the information you provide to us is mandatory, however, some will be requested on a voluntary basis. In order to comply with Data Protection legislation, we will inform you at the point of arrival, whether you are required to provide certain information to us or if you have a choice in this.

5.3 We will only collect the information we need in order to fulfil our purposes.

## **6 HOW DO WE USE YOUR PERSONAL DATA?**

6.1 Most of the personal information the Trust Processes is provided to us directly by you for one of the following reasons;

- 6.1.1 to identify you and keep you safe while on the school site;
- 6.1.2 to account for any visitors to our premises in the event of an evacuation;
- 6.1.3 to keep students and staff safe;
- 6.1.4 maintain accurate records of visits to the school;
- 6.1.5 provide appropriate access arrangements; and

6.1.6 to meet our statutory duties.

## **7      **LAWFUL BASIS****

7.1 We collect and use visitors' information under Article 6 of the UK GDPR. These Articles set out the lawful reasons that we can process your data. We rely on the following for the vast majority of the processing we undertake:

7.1.1 Article 6.1a – consent (in limited circumstances);

7.1.2 Article 6.1c – processing is necessary for compliance with a legal obligation to which we are subject; or

7.1.3 Article 6.1e – processing is necessary for the performance of a task carried out in the public interest.

7.2 Where we have obtained consent, this consent may be withdrawn at any time. We will make this clear when we ask for your consent, and explain how to withdraw it.

## **8      **HOW DO WE STORE YOUR PERSONAL INFORMATION?****

8.1 We do not keep your information for longer than is necessary for the purposes for which it is processed.

8.2 The Trust stores visitor data for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see <https://www.baylearningtrust.com>

8.3 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

## **9      **WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?****

9.1 The **[Academy/School]** does not share your information with anyone without consent unless the law and (if applicable) our policies allow us to do so.

9.2 Where it is legally required or necessary (and it complies with data protection law) we may share personal information about visitors with:

9.2.1 our local authority;

9.2.2 the Department for Education;

9.2.3 educators and examining bodies;

9.2.4 Ofsted;

9.2.5 auditors;

9.2.6 the NHS; and

9.2.7 within our Multi Academy Trust

## 10 YOUR DATA PROTECTION RIGHTS

10.1 Under data protection law, you have rights, including;

10.1.1 **Right to be informed** – about how and why your data is being used.

10.1.2 **Right of access** – you have the right to ask us for copies of your personal information;

10.1.3 **Right to rectification** – you have the right to ask us to rectify personal information you think is inaccurate or to ask us to complete information;

10.1.4 **Right to erasure** – you have the right to ask us to erase your personal information in certain circumstances;

10.1.5 **Right to restriction of Processing** – you have the right to object to the Processing of your personal information in certain circumstances;

10.1.6 **Right to data portability** – you have the right to ask that we transfer the personal information we hold about you to another organisation.

10.1.7 **Right to not to be subject to a decision based solely on automated processing** – for decisions that have a legal or similarly significant effect on individuals.

10.2 You are not required to pay any charge for exercising your rights. If you make a request we must respond in one month.

10.3 Please contact Gavin Gomersall, the Data Protection Officer if you wish to make a request.

Gavin Gomersall  
Data Protection Officer  
The Bay Learning Trust  
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Ripley St Thomas  
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Email: [gomersallg@baylearningtrust.com](mailto:gomersallg@baylearningtrust.com)  
Phone: 01524 581872

## 11 CHANGES TO YOUR PERSONAL DATA

11.1 It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal information changes during your time with us.

## 12 HOW TO COMPLAIN OR WITHDRAW CONSENT

12.1 If you have any concerns about our use of your personal information, wish to exercise your rights in relation to your Personal Data, or make a complaint, please let us know by contacting Gavin Gomersall, the Data Protection Officer.

12.2 You can also complain to the ICO if you are unhappy with how we have used your data.

## 13 CHANGES TO THIS DATA PRIVACY STATEMENT

13.1 We keep our practices and policies regarding the collection, Processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this Data Privacy Statement at any time. We will notify you of any changes made at the appropriate time and may re-issue a new Data Privacy Statement if appropriate.

