

## Privacy Notice for Visitors

**Name of data controller:** The Vyne Community School

### 1. Introduction

Under data protection law, individuals have a right to be informed about how our 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 to the school. The Vyne, is the 'data controller' for the purposes of data protection law. Our data protection officer is Miss Hannah Roberts.

### 2. 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.
- Information relating to the visit, e.g. company or organisation name, arrival and departure time, car number plate.

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required.
- Photographs for identification purposes.
- CCTV images captured in school.

We may also hold data about you that we have received from other organisations, including other schools and social services.

### 3. Why we use this data

We use the data listed above to:

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

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

There are several reasons why we hold, process and share your personal data. Under data protection laws, the lawful reasons for processing personal data include:

- Consent.
- For the performance of a contract.
- To comply with a legal obligation.
- To protect the vital interests of a pupil or another person.
- For a task carried out in the public interest.
- For a legitimate interest of the school or one of the organisations it shares data with (eg legal adviser) except where those rights are overridden by the interests or fundamental rights and freedoms of the data subject which require protection, particularly in the case of a child.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

##### **4.1 Our basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

## **5. Collecting this data**

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily. 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. Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities.
- Government departments or agencies.
- Police forces, courts, tribunals.

## **6. How we store this data**

We keep personal information about you while you are visiting our school. We may also keep it beyond your visit with our school if this is necessary. Our retention schedule sets out how long we keep information about visitors. The retention schedule is available on our website. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We will dispose of your personal data securely when we no longer need it.

## **7. Who we share data with**

We do not share information about you 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 you with:

- Our local authority (Hampshire County Council) – to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- Government departments or agencies.
- Our regulator, Ofsted.
- Suppliers and service providers.
- Our auditors.
- Survey and research organisations.
- Health authorities.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.

### **7.1.1 Sending information to other countries**

With cloud-based storage and some other services sometimes being supplied outside the UK, personal data can be sent to other jurisdictions. Our servers and storage systems are based in the EU or EEA and we have ensured that appropriate safeguards are in place to protect your personal data.

## **8. Your rights**

### **8.1 How to access personal information that we hold about you**

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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 the 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 us (see 'Contact us' below).

### **8.2 Your other rights regarding your data**

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data.
- Prevent your data being used to send direct marketing.
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person).
- In certain circumstances, have inaccurate personal data corrected.
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing.
- In certain circumstances, be notified of a data breach.
- Make a complaint to the Information Commissioner's Office.
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

## **9. 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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF 1

## **10. Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer: Miss Hannah Roberts

[h.roberts@vyne.hants.sch.uk](mailto:h.roberts@vyne.hants.sch.uk)