



L.E.A.D. Academy Trust

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## Privacy notice for visitors

Under the applicable 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**.

We, L.E.A.D. Academy Trust are the 'controller' for the purposes of the applicable data protection law. Our data protection officer is James Beighton (see 'Contact us' below).

### The personal data we collect

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

- Contact details, contact preferences
- Contractor details
- Date(s) and time(s) you visited our school
- The purpose for your visit
- Your images on our CCTV systems throughout the School

We may also hold additional details about you if you are a supply teacher. For more information please see the "supply teacher" section below.

### Why we use this data

We use this data to:

- Contact you where necessary concerning your visit
- For the purposes of track and trace (please see the 'Test and Trace' addendum below for more information)

### Our legal basis for using this data

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

- We need to arrange your visit so that we can enter into or perform our contract with you
- We need it to perform an official task in the public interest (for more information about the lawful basis for the use of your data for 'Test and Trace' purposes, please see the 'Test and Trace' addendum below)

### Supply teacher data

As well as the personal data listed above, we collect additional personal data about visitors to our school who are engaged under a contract for the temporary supply of teaching services ("Supply Teachers"). This includes:



## L.E.A.D. Academy Trust

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- Their photograph
- Information relating to actual or suspected criminal convictions and offences if disclosed in response to a check carried out by the Disclosure and Barring Service (“DBS Check”)

We collect this information for the purposes of conducting verification and vetting, including criminal background checks. We rely on the lawful basis that the processing is necessary for us to comply with a legal obligation.

Please note that information in a DBS Check may include criminal offence data. We are required by law to treat this type of information with even more care than usual and different lawful bases apply to them. We rely on the lawful basis that it is in the substantial public interest to collect this data, on the condition that it is necessary to safeguard children.

### **Collecting this information**

While the majority of information we collect about visitors is mandatory to enter the school, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

### **How we store this data**

We keep personal information about visitors while they are attending our school for the duration of their contract. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our records retention policy sets out how long we keep information about visitors. [We store our CCTV footage in line with our CCTV policy which can be found [INSERT].

To view our policy please request a copy of policy GDPR Doc 2.4 from the school office.

### **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:

- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Health authorities (for more information about sharing information with the NHS for Test and Trace purposes, please see the ‘Test and Trace’ addendum below)
- Security organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.



L.E.A.D. Academy Trust

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## Visitors' rights regarding personal data

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 or your child
- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our school office.

## Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

## 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



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**Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our school office.



L.E.A.D. Academy Trust

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## Privacy Notice – Coronavirus - Test and Trace

Responding to the Coronavirus advice from the Government is an obligation on all schools in England.

The development of the NHS 'Test and Trace' scheme is a key part of the government plan to manage Coronavirus. More information about NHS Test and Trace, and how it works, is available [here](#).

As more pupils are returning to our schools, the safety and wellbeing of pupils, staff and their families is a priority.

Planning to manage a safe return is in place, however our responsibility extends beyond the school gates.

We currently hold information about you, including the personal data described in our privacy notices and it may be necessary for us to share the below personal data on request from NHS Test and Trace workers:

- your name;
- your contact details (including your phone number and email address);
- the date(s) and time(s) you visited our school; and
- where relevant, the fact that you have interacted with another individual at our school.

The NHS will ask us to provide contact details where it is necessary, either because someone who has tested positive for COVID-19 has listed our school as a place they have visited within 14 days of their test, or because our school has been identified as the site of a potential outbreak of COVID-19.

We will share the details listed above if requested. The NHS will then carry out a contact-tracing exercise and will contact individuals it believes have been exposed to the virus and provide them with appropriate advice. We will not share any details about your health, including testing positive for, or having symptoms of, COVID-19.

We will record, and share with the NHS, your details as described above for the purposes of supporting the government and the NHS in identifying people who may have been exposed to coronavirus and to protect our school's staff, students and the public against the pandemic.

We will be sharing data on the basis that this is a task carried out in the public interest.

We will keep your personal data for the time specified in our privacy notice, please see the 'how we store this data' section above. We will keep information recorded solely for Test and Trace purposes (such as information about interaction with other) for a period of 21 days, after which time such data will be securely deleted.

You have certain rights in relation to your personal data. More information about your rights, and how to exercise them, is available in our student, staff and parent privacy notices, as relevant.

This Privacy Notice should be read alongside the other privacy notices provided to you from time to time, including the GDPR and Data Protection notices on our website.

## NHS Test and Trace and the law

We are required by law to always have a permitted reason or justification (called a "lawful basis") for sharing your personal data. There are six such permitted lawful basis for processing personal data. As mentioned above, the lawful basis for processing your personal data for the purposes of test and trace is public task. The section of the GDPR that applies is:



L.E.A.D. Academy Trust

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Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'