

PRIVACY NOTICE

VISITORS

# 1. Introduction

Under UK 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.**

We, New Avenue School, are the ‘data controller’ for the purposes of UK data protection law.

Our data protection officer is Clare Priday (see ‘Contact us’ below).

# 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, and vehicle number plate
* Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

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 health conditions you have that we need to be aware of
* Sickness records
* Photographs and CCTV images captured in school
* Information about trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

# 3. Why we use this data

We use the data listed above to:

1. Identify you and keep you safe while on the school site
2. Keep pupils and staff safe
3. Maintain accurate records of visits to the school
4. Provide appropriate access arrangements
5. Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

3.1 Use of your personal data in automated decision making and profiling

We don’t currently put pupils’ personal data through any automated decision making or profiling process. This means we don’t make decisions about you using only computers, without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

3.2 Use of your personal data for filtering and monitoring purposes

While you’re in school, we may monitor what material you access on our computers and other IT and communication systems. We do this so that we can:

* Comply with health and safety law and other laws
* Comply with our policies
* Keep our network(s) and devices safe from people who aren’t allowed to access them, and prevent harmful software from damaging our network(s)

# 4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

* For the purposes of a,b,c,d and e, in accordance with the ‘public task’ basis – we need to process data to fulfil our statutory function as a school as set out, but not limited to, the following legislation and/or guidance:
	+ Education Act (1996)
	+ KCSiE (2023)
	+ Data Protection Act (2018)
	+ Equalities Act (2010)

Where you have provided us with consent to use your child’s 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 1 of the following conditions for processing as set out in UK 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 UK 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 most of the information we collect about you is mandatory (i.e. you have to give us the information), there is some information that you can choose whether or not to give us.

Whenever we want to collect information from you, we make it clear whether you have to give us this information (and if so, what the possible consequences are of not doing that), or whether you have a choice.

Most of the data we hold about you will come from you or your parents, but we may also hold data about you from:

* Local councils
* Government departments or agencies
* Police forces, courts or tribunals

# 6. How we store this data

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our records management policy sets out how long we keep information about parents and carers. This is available on our website.

We have put in place appropriate security measures to prevent your personal information 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 don’t share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it’s legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

* Our local authority, Hampshire – because we have to share certain information with it, such as safeguarding concerns and information about exclusions
* Government departments or agencies
* Our regulator, Ofsted
* Suppliers and service providers:
	+ School Fit
	+ Arbor
* 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 or tribunals

7.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

# 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 information is used and kept safe. For example, you have the right to:

* Say that you don’t want your personal information to be used
* Stop it being used to send you marketing materials
* Say that you don’t want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
* In some cases, have it corrected if it’s inaccurate
* In some cases, have it deleted or destroyed, or restrict its use
* Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
* In some cases, be notified of a data breach
* Make a complaint to the Information Commissioner’s Office
* Claim compensation if the data protection rules are broken and this harms you in some way

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

# 10. Contact us

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

Our data protection officer is:

* TBC

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them:

* Clare Priday