

## Privacy Notice for Visitors

In the development of this policy consideration has been given to Equality and Diversity and Data Protection.

### Equality and Diversity

DEMAT is committed to promoting equality of opportunity for all staff and job applicants. The Trust aims to create a supportive and inclusive working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We do not discriminate against staff based on age; race; sex; disability; sexual orientation; gender reassignment; marriage and civil partnership; pregnancy and maternity; religion, faith or belief (Equality Act 2010 protected characteristics). The principles of non-discrimination and equality of opportunity also apply to the way in which staff and Governors treat visitors, volunteers, contractors and former staff members.

### Data Protection

DEMAT will process personal data of staff (which may be held on paper, electronically, or otherwise). DEMAT recognises the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA).

This Policy is to be used across all DEMAT schools	Version	Date
DEMAT Officer responsible for updating content – DPO	2	August 2018
Date approved by DEMAT Standards & Ethos Committee		
Effective date as determined by DEMAT	2	1 <sup>st</sup> Sept 2018
Notice to be reviewed annually from date last approved by DEMAT Standards & Ethos Committee	2	Annually
Template from The Key for School Leaders and including DfE guidance (The Key section was <small>Approved by</small> <b>forbessolicitors.</b> )		Downloaded 6/8/18
Policy to be reviewed by DEMAT (unless statutory revisions require it be done earlier)		September 2019

The Diocese of Ely Multi Academy Trust (DEMAT)  
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Company registration number: 08464996

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## Application of the Policy

This policy is to be used by all employees employed by The Diocese of Ely Multi-Academy Trust (DEMAT). The following definitions are included for reference purposes for both School and Central Team staff to enable clarity and transparency when applying this policy.

## **Privacy Notice for Visitors**

Under data protection law, individuals have a right to be informed about how the Trust 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 individuals we employ, or otherwise engage, to work at our trust and its schools.

We, Diocese of Ely Multi Academy Trust, Grace Building, 8 High Street, Ely, CB7 4JY, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Joanne Patterson (see 'Contact us' below).

### **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 restricted to:

- Contact details
- Information relating to your visit, eg your company or organisation name, arrival and departure time, car number plate
- Photographs for the duration of your visits
- CCTV images (where CCTV is installed across trust sites)
- Information about any access arrangements you may need (which falls into "special categories"

### **Why we use this data**

We use this data 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

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

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we need to comply with our legal obligation to keep our pupils and staff safe while on the school premises.

Less commonly, we may also process your personal data in situations where:

- We need it to perform an official task in the public interest
- We have obtained consent to use it in a certain way
- We need to protect someone's vital interests (save your life, or someone else's)

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

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data

### **Collecting this information**

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information to us.

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.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

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

We will keep your personal data while you are visiting our school.

We may also keep it beyond this, if necessary, to comply with our legal obligations.

Our [Record Retention Schedule/Records Management Policy](#) sets out how long we keep information about visitors which can be found via our website: <http://demat.org.uk/compliance/>.

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.

### **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:

- Our local authority – to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- The Department for Education
- Educators and examining bodies
- Our regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Central and local government
- Our auditors
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies
- The organisation/company you are representing

## 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 trust or its schools 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
- 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 complete the form that can be found on our website:

<http://demat.org.uk/compliance/> under GDPR policies and return to [dpo@demat.org.uk](mailto:dpo@demat.org.uk).

### Your other rights regarding your data

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

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to 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, 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.

### 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**:

- Joanne Patterson, [DPO@DEMAT.org.uk](mailto:DPO@DEMAT.org.uk)

## 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

*This notice is based on the [Department for Education's model privacy notice](#) for the visitors, amended to reflect the way we use data in this trust and its schools.*