



## **Privacy Notice for Visitors to the Trust**

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 visitors to the trust in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Carlton Academy Trust, are the 'data controller' for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our Data Protection Officer (DPO) is Mr D Harvey-Hill and can be contacted in writing:

Mr D Harvey-Hill  
University Academy  
Green Head Road  
Utley  
Keighley  
BD20 6EB

### **The personal data we hold**

Personal data what we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- ✓ Name
- ✓ Contact details
- ✓ Information relating to your visit, e.g. your company or organisation name, arrival and departure times, vehicle registration
- ✓ Photographs for identification purposes for the duration of your visit
- ✓ CCTV images captured in school
- ✓ Information about any access arrangements you may need

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

We use this data to:

- ✓ Identify you and keep you safe while visiting the trust sites
- ✓ Keep students and staff safe
- ✓ Maintain accurate records of visits to the trust sites
- ✓ 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 students and staff safe while on trust 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Where we have obtained consent, this consent can be withdrawn at any time.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 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 whilst you are visiting our schools. We may also keep it beyond this, if necessary, to comply with our legal obligations.

Our DPO can provide information regarding how long we keep information about visitors. 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:

- ✓ The 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; to meet statutory and legal obligations to share certain information with them
- ✓ Educators and examining bodies; necessary in the performance of our education function
- ✓ Our regulator, Ofsted; to enable it to evaluate the education we provide and which is in the public interest



- ✓ Suppliers and service providers; to enable them to provide the service we have contracted them for
- ✓ Central and local government; to meet statutory and legal duties and to enable the performance of contract
- ✓ Auditors; to demonstrate that we have taken appropriate action in providing our education service
- ✓ Health authorities; to assist where there are legal obligations
- ✓ Security organisations; with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- ✓ Health and social welfare organisations; to support a legal entitlement
- ✓ Professional advisors and consultants; to support a legal entitlement and to assist with insurance claims
- ✓ Police forces, courts, tribunals; in order to uphold law and order
- ✓ Professional bodies; to verify information for legal purposes
- ✓ The organisation/company you are representing; to verify business interests and to verify information for legal purposes.

### **Your rights: How to access the personal information we hold about you**

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
- ✓ 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 a 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 our Data Protection Officer, as above.

### **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 a person)
- ✓ In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its 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, as above.



## Complaints

We take any complaints regarding our collection and use of personal data 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 by writing to our Data Protection Officer, as above.

- ✓ Alternatively, you can make a complaint to the Information Commissioner's Office:
- ✓ Report a concern online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)
- ✓ Call: 0303 123 1113
- ✓ In writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF