

# WEST DERBY SCHOOL



## Visitors and General Public Privacy Notice

This policy will be reviewed:	Annually
Last reviewed on:	22/02/2023
Approved on:	27/03/2024
Next review date:	31/03/2025
Signed:	S Graham (Headteacher)
Signed:	K Hodgkiss (On behalf of the Trust Board)

## 1 **COMPLIANCE**

- 1.1 This privacy notice meets the requirements of the General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018.

## 2 **ABOUT THIS NOTICE**

- 2.1 Our school processes personal information relating to pupils, staff and visitors, and, therefore, is a Controller.
- 2.2 The school is registered as a Controller with the Information Commissioner’s Office and renews this registration annually. The school’s registration number is: ZA140863.
- 2.3 This notice sets out the duties of West Derby School (“the School”) under each of the legislation provisions referred to in paragraph 1 of this notice, the responsible bodies/person for compliance and the procedures that will be applied.
- 2.4 During the course of its activities the School will process personal data (which may be held on paper, electronically, or otherwise) about the School’s visitors and some members of the general public.
- 2.5 The purpose of this notice is to make individuals (referred to as ‘data subjects’ under data protection law) aware of how the School will handle personal data of the general public and visitors.

## 3 **WHAT IS PERSONAL DATA**

- 3.1 Personal data is any information that ‘relates to’ an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly (e.g. because it includes your name).
- 3.2 It also includes information relating to you, from which you cannot be directly identified, if you can be identified from that information when it is used in combination with other information we hold about you.
- 3.3 Personal Data can include information relating to you that has been ‘pseudonymised’, meaning that any information that directly or indirectly identifies you (e.g. your name) is removed and replaced with one or more artificial identifiers or pseudonyms.
- 3.4 However, truly anonymous data, or data that has had any identifying information permanently removed from it, does not count as Personal Data. When considering whether information ‘relates to’ you for the purposes of Data Protection Legislation, we take into account a range of factors, including the content of the information, the purpose or purposes for which we are Processing it, and the likely impact or effect of that Processing on you.

## 4 **WHAT PERSONAL DATA DO WE COLLECT?**

- 4.1 To carry out our duties as a provider of education we collect information about you that enables us to meet regulatory and contractual obligations and ensure the effective management of the Trust. This includes processing for quality assurance, service improvement, providing information for statistical and audit purposes and ensuring that all health and safety standards are met.
- 4.2 The personal information we collect may include one or more of the following:

- 4.2.1 Your name
- 4.2.2 Your contact details
- 4.2.3 Details of your representatives
- 4.2.4 Vehicle registration details
- 4.2.5 CCTV images
- 4.2.6 Correspondence with us including complaints, suggestions and compliments
- 4.2.7 Information you may send to us or enter onto our website
- 4.2.8 Any information you choose to share with us.

## **5 COLLECTING THE PERSONAL DATA**

- 5.1 Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK GDPR, we will inform you whether you are required to provide certain information to us or if you have a choice in this. We endeavour to keep the information we collect about you to that which is necessary to enable the trust to demonstrate effective governance and meet its obligations in law.

## **6 HOW DO WE USE YOUR PERSONAL DATA?**

- 6.1 We use your personal data for a number of purposes including the following:
  - 6.1.1 To account for any visitors to our premises in the event of an evacuation
  - 6.1.2 To ensure the most appropriate response to any questions you ask
  - 6.1.3 For the prevention and detection of crime and the identification of those responsible
  - 6.1.4 To comply with statutory requirements
  - 6.1.5 To improve the quality of the service we deliver

## **7 THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION**

- 7.1 Under the UK GDPR the lawful bases we rely on for processing this information are;
  - 7.1.1 You have provided consent
  - 7.1.2 It is necessary for us to be legally compliant
  - 7.1.3 To fulfil your contractual obligations.
- 7.2 We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

## **8 STORING THIS INFORMATION**

- 8.1 We don't keep your information for longer than is necessary for the purposes for which it is processed. This is in accordance with our data retention guidelines.
- 8.2 We have IT systems that we use to keep your information safe and secure. Where this information is on a database that is not hosted by the Trust, we have service contracts with providers that give assurance of compliance with the relevant legislation and standards for data security.
- 8.3 Where your information is not kept electronically we have security measures, policies and an audit process in place to ensure your information remains secure, not retained or processed unless there is a documented justifiable reason and is only shared on a "needs to know" basis.

8.4 The length of time that we will retain your information will vary depending on the nature of the record. This will be done in accordance with the prevailing data retention guidelines adopted by the trust.

## 9 REQUESTING ACCESS TO YOUR PERSONAL DATA

9.1 Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Mr T Card, Data Protection Officer.

9.2 You also have the right to:

- 9.2.1 access copies of your personal information;
- 9.2.2 object to processing of personal data that is likely to cause, or is causing, damage or distress;
- 9.2.3 prevent processing for the purpose of direct marketing;
- 9.2.4 object to decisions being taken by automated means;
- 9.2.5 request that we transfer the personal information we hold about you to another organisation;
- 9.2.6 in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- 9.2.7 complain to the Information Commissioner's Office or seek judicial remedy in certain circumstances

9.3 You are not required to pay any charge for exercising your rights. If you make a request we must respond in one month.

9.4 If you have a concern about the way we are collecting or using your personal data or wish to exercise your rights, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you are unhappy about how we have used your data.

## 10 FURTHER INFORMATION

10.1 If you would like to discuss anything in this privacy notice, please contact: Mr T Card, Data Protection Officer either by telephone on 0151 235 1300 or by email to [a.card@westderbyschool.co.uk](mailto:a.card@westderbyschool.co.uk).

## 11 CHANGES TO THIS DATA PRIVACY NOTICE

11.1 We keep our practices and policies regarding the collection, Processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this privacy notice at any time. We will notify you of any changes made at the appropriate time and may re-issue a new privacy notice if appropriate.