

Privacy Notice (How We Use Visitor Information)

This Privacy Notice for visitors explains how and why we store personal information about those who visit the school. It provides a guide to our legal obligations and their own rights. Like any organisation which handles personal data, the HMFA Trust is the 'Data Controller' as such, we are registered with the ICO (Information Commissioner's Office) and we comply with UK General Data Protection Regulation (UK GDPR). Our ICO registration number is Z3008898.

The Categories of Visitor Information That We Process Include:

We process the following personal information from visitors:

- **Name**
- **Contact details**
- **Information relating to the visit e.g. company or organisation name, arrival and departure time, and vehicle number plate**
- **Purpose of visit**

We may also collect, use, store and share (where appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- **Information about any access arrangements that may be required**
- **Photographs for identification purposes**
- **CCTV images captured in school**

We may also hold data about you that we received from other organisations, including other schools and social services.

Why We Collect and Use Visitor Information

We use visitor data to:

- Ensure the safeguarding of young people and vulnerable adults
- Maintain high standards of health and safety
- Maintain accurate records of visits to the school
- Provide appropriate access arrangements

Under the UK General Data Protection Regulation (UK GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:

(6c) A Legal obligation: the processing is necessary for us to comply with the law.

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation.

Storing Visitor Information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection Policy by visiting <https://hmfa.org.uk/information/policy-documents/>

Who We share Visitor Information With

We do not share visitor information with third parties unless we are legally required to do so.

Sign In App

Visitors sign in to the school using the Sign In App online application on the school iPad. No special category data is used in this system. Personal data is collected for visitors on arrival at the school and used for the duration of their stay. Repeat visitors' data is held for one academic year. This data is protected by encryption on the Sign In App database.

Access to personal data is restricted to specific staff who need to have a business need to do so with staff having a background check before starting their job. For support purposes, a limited number of senior engineers can access client data via a secure tunnel, controlled by private key-based secrets.

Requesting Access to Your Personal Data

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 informationgovernance@herefordshire.gov.uk

Data Protection Officer at Herefordshire Council, Plough Lane, Hereford HR4 0LE

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO

Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Last Updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 21.09.24

Contact

If you have any questions or concerns, or would like to discuss anything in this privacy notice please contact our data protection lead:

jbrace@ls,hmfa.org.uk

or our Data Protection Officer:

SchoolPro TLC Ltd DPO@schoolpro.uk.

Document Version Control Log

Version	Date	Description of changes and person/organisation responsible
1.0	28/04/2021	Document created (SchoolPro TLC)
1.1	09/01/2022	Adjusted for Short text Page 2
1.2	17/10/2022	Text updated in 'Requesting Access to Your Personal Data' to reflect new DfE wording regarding data subject rights. Bullet point list has been updated as well as introductory text to the list. (SchoolPro TLC)
1.3	17/10/2022	SchoolPro TLC contact email updated from GDPR@schoolpro.uk to DPO@schoolpro.uk . (SchoolPro TLC)
1.4	30/08/2024	Updates made to three sections as per the DfE template updates. Updates as follows:

		- Requesting access to your personal data - replaced entire section with new text (SchoolPro TLC)
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