



Privacy notice for Visitors to Moordown St John's Primary School

Under data protection law, individuals have a right to be informed about how the 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 Moordown St John's CE Primary School, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Moordown St John's CE Primary School, are the 'data controller' for the purposes of data protection law. Our Data Protection Officer is Kim Bainton (Contact details shown below in Section 9, How to Contact us).

1.0 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 your visit, e.g. your company or organisation name, arrival and departure time
- CCTV images captured in school
- Photographs for identification purposes for the duration of your visit
- Information about any access arrangements you may need

2.0 Why we use this data

The purpose of collecting your personal data is to support the school 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
- Comply with legal and statutory requirements.

3.0 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Where we have obtained consent, this consent can be withdrawn at any time.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.

4.0 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.

5.0 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.

All personal data is stored in accordance with our Records Retention Schedule/Records Management policy. A copy of this is available from the School Office or may be downloaded from the Data Protection/GDPR section of our website

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, in accordance with the above-mentioned records retention/management policy

6.0 Data sharing

We do not share information about you 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 you with:

- *The Academy Trust – for monitoring and school improvement purposes*
- *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*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Security organisations – such as to ensure the security of premises/staff/pupils/other visitors*
- *Professional advisers, bodies and consultants – such as for support/advice*

- *Charities and voluntary organisations – such as for support/advice*
- *Police forces, courts, tribunals – such as for the prevention/detection of crime or fraud; or if there is an issue with a visitor that puts the safety of our pupils, staff or other visitors at risk*
- *The organisation/company you are representing - such as to confirm the reason for your visit and that any required checks have been undertaken.*
- *NHS Track and Trace Covid 19 – to report on those in close contact with anyone who has tested positive for Covid-19 within the setting.*

Data sharing with NHS Track and Trace – Covid-19

The law on protecting personally identifiable information, known as the General Data Protection Regulation (GDPR), allows Public Health England to use the personal information collected by NHS Test and Trace Service.

Therefore if required to do so by the NHS Track and Trace Services, Moordown St John's Primary School will provide the contact details of all children and adults that have been in close contact with anyone that has tested positive for Covid-19 within the setting.

This is in accordance with Article 6(1)(e) of the GDPR '*processing is necessary for the performance of a task carried out in the public interest*'.

For more information please see the following government guidance.

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works#how-nhs-test-and-trace-service-works>

<https://contact-tracing.phe.gov.uk/help/privacy-notice>

6.1 How the Government uses Government uses Governor/Director Data

The governor/directors data that we lawfully share with the DfE via GIAS:

- will increase the transparency of governance arrangements
- will enable Academies and the department to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allows the department to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role

As part of the statutory school inspection process, we are required to share information with our regulators, OfSTED and SIAMS (Statutory Inspection of Anglican and Methodist Schools). Information may also be shared with our auditors. Where possible such data is anonymised before sharing.

Occasionally we may share information with the Health and Safety Executive as part of our legal obligation to report certain accidents/incidents/near misses under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

6.1 Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

7.0 Your rights: requesting access to personal data (Subject Access Request)

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 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 our Data Protection Officer.

7.1 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.

8.0 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 our Data Protection Lead in the first instance; contact details are shown in Point 9 below.

To make a complaint, please contact our Data Protection Officer, contact details are shown in Point 9 below.

Alternatively, you can make a complaint direct to the Information Commissioner, see Point 10.

9.0 How to contact us for further information

If you would like further information or have a concern or complaint about how we are using your information, we would ask you to contact us:

Our school-based Data Protection lead is Nicky Armstrong (Admin & Personnel Manager)
Telephone: 01202 527683 ext 202 Email n.armstrong@st-johns.bournemouth.sch.uk
Nicky Armstrong, Moordown St John's CE Primary School, Vicarage Road, Bournemouth BH9 2SA

Our independent Data Protection Officer is Kim Bainton (School Business Manager, Kingsleigh Primary School) Telephone: 01202 528893 Email kim.bainton@kingsleighprimary.co.uk
Kim Bainton, Kingsleigh Primary School, Hadow Road, Bournemouth BH10 5HT

10.0 Information Commissioner

For further information about Information Rights legislation or to make a complaint, please contact the Information Commissioner's Office at www.ico.org.uk or telephone **0303 123 1113** or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Concerns can also be reported online at <https://ico.org.uk/concerns/>