Privacy Notice for Visitors

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our 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 school or to our trust central office**.

The trust, The Propeller Academy Trust, Fitzwaryn School, Denchworth Road, Wantage, OX12 9ET, is the 'data controller' for the purposes of UK data protection law.

2. 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:

- Your name
- Contact details
- Information relating to your visit, e.g. company or organisation name, arrival and departure time, vehicle number plate
- Information about your use of or information and communication systems, equipment and facilities.

We may also collect, use, store and share (when 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 collect, use, store and share (when appropriate) information about criminal convictions and offences.

3. Why we use this data

We collect and use the data listed above to:

a) Identify and keep you safe while you are on school site

b) Keep pupils and staff safe

c) Maintain accurate records of visits to the school site

d) Provide appropriate access arrangements

e) Make sure our information and communication systems, equipment and facilities are used appropriately, legally and safely

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text prompting school or trust-wide events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the unsubscribe link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision-making and profiling

We do not currently process any visitors' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network and devices safe from unauthorised access, and prevent malicious software from harming our network

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- For purposes of a), b), c), d) in accordance with the 'public task' basis – we need to process to fulfil our statutory function as a trust
- For the purposes of a), b), c), d), e), in accordance with the 'legal obligation' basis - we need to process data to meet our responsibilities under law
- For the purposes of e), in accordance with the 'legitimate interest' basis – where there's minimal privacy impact and we have a compelling reason.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

5. Collecting this data

We will only collect and use your personal information when the law allows us to, as detailed above in section 4 of this notice. Some information is required to enable us to manage access to our premises and meet our safeguarding, security, and health and safety obligations. If you choose not to provide this information, we may be unable to permit access to the site. Other information may be provided voluntarily, and we will make this clear when requesting it.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Your employer or organisation
- Other schools or trusts
- Local Authorities
- Government departments and agencies
- Regulatory bodies, including Ofsted
- Emergency services, police forces, courts or tribunals

6. How we store this data

We keep personal information about you while you are visiting our school or trust office. We may also keep it beyond your visit with our school or trust office if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our data retention schedule sets out how

long we keep information about visitors. Please contact us (see 'Contact us' below) for a copy of the retention schedule.

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 have a legal requirement to retain it.

7. Who we share data with

We do not share personal 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 UK data protection law), we may share personal information about you with:

- Our local authorities, Oxfordshire and Bracknell Forest to meet our legal obligation to share certain information with them, such as safeguarding concerns
- Our IT and systems providers to operate our electronic visitor sign in system and CCTV network
- Emergency services and health authorities
- Police forces, courts and tribunals
- Our regulator, Ofsted, to demonstrate compliance with statutory safeguarding and site security requirements

7.1 Transferring data internationally

We do not routinely transfer visitor personal data outside the United Kingdom. Where a service provider processes personal data outside of the UK, we will ensure that appropriate safeguards are in place in accordance with UK data protection law.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are 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 us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge 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 or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information the right way
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We are committed to upholding your data protection rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, we encourage you to let us know.

In compliance with our statutory duties under the Data (Use and Access) Act 2025. We have established a formal process for handling data protection complaints.

You can submit a complaint in any of the following ways:

- Online: Complete and submit the online form
- Email: Send the details of your concern to dpl@propellertrust.org
- Post: Write to our Data Protection Lead, at The Propeller Academy Trust, The Lambourn, Wyndyke Furlon, OX14 1UJ
- Verbally: You can raise a verbal complaint with a member of our staff who will ensure that it is logged formally

We will acknowledge your complaint within 30 days of receipt and keep you updated on our investigation progress.

If you are not satisfied with our final response, you have the right to escalate your complaint to the Information Commissioners Officer. You can find out more information about this on the ICO's website https://ico.org.uk/make-a-complaint/.

10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Lead (DPL)** on dpl@propellertrust.org.