Policy Name	**PRIVACY NOTICE – VISITORS**
Relevant To	**Federation ☒** **Bidwell Brook Only ☐** **Ellen Tinkham Only ☐**
Policy Type	**Model ☒** **School ☐**
Name of Holder	**Christine Walker**
Subject/Department	**Data Protection**
Approved By	**Full Governing Body ☐** **CBT Governors ☒** **T&L Governors ☐** **SLT ☐**
Version Date (if applicable)	**v2 August 2025**
Date of Last Review	**Autumn Term 2026**
Date of Next Review	**Autumn Term 2027**

1. Purpose of this Notice

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 Notice explains what information about individuals visiting the school we collect, why we collect it and how we keep it secure. It is aimed at occasional and professional visitors to the school, who are required to sign in using the school's visitor system.

The Learn to Live Federation processes visitor personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data Use & Access Act 2025, henceforth collectively known as 'data protection legislation'.

We comply with the data protection principles when gathering and using personal information as set out in our Data Protection Policy on our school websites and are committed to protecting the privacy and security of our visitors' personal information.

2. Data Controller

As a public authority, we are a 'data controller' which means that we are responsible for deciding how we hold and use personal information about you.

The Learn to Live Federation is known as the 'Data Controller' for data protection legislation purposes and is registered with the Information Commissioner's Office (ICO) under registration number ZC081975.

3. What data we collect

We may collect and process the following information about you:

- your full name and contact details (usually an email address)
- name of the company you work for (where relevant)
- your car registration number (if parked on our premises)
- Disclosure and Barring Service (DBS) Certificate number (where relevant)
- Your image captured on our electronic visitor management system and CCTV cameras.

4. Why we collect your data

We need this information in order to keep a register of who is on our premises, for the following reasons:-

- Identify you and safely evacuate the school in the event of a fire or other emergency
- To meet our statutory obligations for safeguarding children and young people
- To create an identification badge for security purposes
- To send you a link to this Privacy Notice or our emergency evacuation procedures (upon request)

5. Legal basis for processing

When processing personal data about visitors to our school, we rely on the following legal bases, as outlined in Article 6 of the UK GDPR:

- It is necessary for us to perform a task carried out in the public interest or in the exercise of our official duties
- It is necessary for us to comply with a specific legal obligation
- Where we have legitimate interests for example the use of photographs to enable us to clearly identify you in the event of an emergency evacuation
- We need to protect your vital interests (or someone else's vital interests)
- You have given us your consent

Some of the reasons listed above may overlap, and there may be several grounds which justify the school's use of your data.

6. Who do we share your data with and why?

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and complies with UK data protection law) we may share personal information about you with:

- Our local authority
- Suppliers and service providers such as visitor management systems to enable them to provide the service we have contracted them for.
- The Police or the Courts

7. Retention periods

We only keep your information for as long as we need to, and no longer. Your information is held in line with our Records Retention Schedule, which is available on the school website.

8. Security of your Information

We have put in place measures to protect the security of your information (ie to prevent it being accidentally lost, used or accessed in an unauthorised way).

Where we store your information electronically, it is held securely on the school's IT network. Secure storage is also provided for paper-based records by way of locked filing cabinets / rooms and restricted access permissions.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

9. International Transfers

Every effort is taken to try and use third party suppliers within the boundaries of the European Economic Area (EEA) to ensure the data protection rights of individuals. However, there may be occasions where the system supplied by an organisation is outside of the EEA for example the United States. Where personal data is transferred outside the UK or EEA to a country that is not designated as 'adequate' in relation to data protection law, we will ensure the personal data is adequately protected using International Data Transfer Agreements, appropriate security measures, and other appropriate safeguards.

10. Your data protection rights

Your right of access - You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to us processing your information where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your contact details to send you direct marketing or fundraising communications.

Your right to data portability - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in talks about entering into a contract) and the processing is automated.

Your right to withdraw consent - In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Nikki Burroughs, Executive Head, nikki.burroughs@learntolivefederation.co.uk

Once we have received your notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

Your right to complain - We work to high standards when it comes to processing your personal information.

We hope you will always be happy with the way we handle your data so if we have not met your expectations, please let us know so we can put things right. Please contact Nikki Burroughs, Executive Head via email – nikki.burroughs@learntolivefederation.co.uk – in the first instance.

We take any formal complaints about our data collection and use of personal information very seriously. Under the Data Use and Access Act 2025, any complaints to ourselves as the "Data Controller" must be acknowledged within 30 days followed by an investigation and response. Please bear in mind these timescales may be difficult for us to achieve should you submit your complaint either just before or during a school holiday. However, we will do our best to keep you informed about when you can expect us to respond to you.

Further details about our data complaints process can be found in the Data Protection Complaints Policy, along with a form for you to complete. This policy is available to download on our school websites and you are not required to pay a charge for exercising your rights.

After receiving the response to our investigation, if you still remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). The ICO's contact details are available at https://ico.org.uk/concerns Further information about your data protection rights, can be found on the Information Commissioner's Office website at www.ico.org.

If you are a parent/carer and want to request a copy of your child's educational record, this type of request will be handled under The Education (Pupil Information) (England) Regulations 2005. We will respond to these types of requests within 15 working days (ie days when the school is open).

11. Further information

If you have any queries about this privacy notice, or the way your personal information is being handled by the school, see our Data Protection Policy which is publicly available on our website or contact our Data Protection Officer, Jenny Goodall at Devon County Council.

12. Updates to this Notice

We will update this notice periodically. The latest version will always be available on our website or from the school office, and we will notify you when any changes are made.