

Privacy Policy for Visitors

In the development of this policy consideration has been given to Equality and Diversity and Data Protection.

Equality and Diversity

CAMPFIRE EDUCATION TRUST is committed to promoting equality of opportunity for all staff and job applicants. The Trust aims to create a supportive and inclusive working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We do not discriminate against staff based on age; race; sex; disability; sexual orientation; gender reassignment; marriage and civil partnership; pregnancy and maternity; religion, faith or belief (Equality Act 2010 protected characteristics). The principles of non-discrimination and equality of opportunity also apply to the way in which staff and Governors treat visitors, volunteers, contractors and former staff members.

Data Protection

CAMPFIRE EDUCATION TRUST will process personal data of staff (which may be held on paper, electronically, or otherwise). CAMPFIRE EDUCATION TRUST recognises the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA).

This Policy is to be used across all Campfire Education Trust Schools	Version	Date
Campfire Education Trust Officer responsible for updating content – DPO	2	May 2020
Date approved by Campfire Trust Board		
Notice to be reviewed annually from date last approved by Campfire Trust Board		Annually
Policy to be reviewed by Campfire Education Trust (unless statutory revisions require it be done earlier)		1 st September 2021

Policy Contents

	Page Number(s)
1. The personal data we hold	3
2. Why we use this data	3
3. Our lawful basis for using this data	4
4. Collecting this data	4
5. How we store this data	4
6. Data sharing	4
7. Your rights	5
8. Contact Us	6
9. Complaints	6

Application of the Policy

This policy is to be used by all employees employed by Trust (CAMPFIRE EDUCATION TRUST). The following definitions are included for reference purposes for both School and Central Team staff to enable clarity and transparency when applying this policy.



Privacy Policy for Visitors

Under data protection law, individuals have a right to be informed about how the 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 individuals we employ, or otherwise engage, to work at our trust and its' schools.

We, the Campfire Education Trust, Burleigh Piece, Linden Village, Buckingham, MK18 7HX are the 'data controller' for the purposes of data protection law.

Our data protection officer is Tracey Riches (see 'Contact us' below).

The personal data we hold

We process data relating to those applying to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Information relating to your visit, eg your company or organisation name, arrival and departure time, car number plate
- Photographs for the duration of your visits
- CCTV images (where CCTV is installed across trust sites)
- Information about any access arrangements you may need (which falls into "special categories")

Why we use this data

We use this data 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

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

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.

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.

Our Record Retention Schedule/Records Management Policy sets out how long we keep information about visitors which can be found via our website <https://campfiretrust.co.uk/legal>.

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.

Data sharing

We do not share information about visitors 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 it complies with data protection law) we may share personal information about visitors with:

- 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
- The Department for Education
- Educators and examining bodies
- Our regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Central and local government
- Our auditors
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Professional bodies
- The organisation/company you are representing

Your rights

How to access personal information we hold about you

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 complete the form that can be found on our website and return to dpo@campfiretrust.co.uk.

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.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Tracey Riches, DPO@campfiretrust.co.uk

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 us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

This notice is based on the Department for Education's model privacy notice for parents of pupils, and to reflect the way we use data in this school.