

PRIVACY NOTICE: VISITORS & CONTRACTORS

September 2023



Introduction

This privacy notice explains what personal information Windlesham House School (“the School”) holds about visitors including contractors. It explains why the School holds this information, what the School does with it and how long the School keeps it for and if the School shares it with third parties.

This Privacy Notice concerns the School’s processing of personal data of past, present and prospective visitors. This privacy notice is aimed at occasional and professional visitors to the school, who are required to sign in and out at Reception.

The School is committed to protecting visitors’ personal information and being transparent about what information the School holds about visitors, how the School uses it and who the School shares it with.

This privacy notice informs visitors what to expect when the School collects personal information.

Parents/Guardians visiting the School to drop off or collect their child are not classed as visitors.

Windlesham House School is the ‘data controller’ for the purposes of data protection law.

Privacy Officer (PO)

The designated Privacy Officer at Windlesham House School (“the School”) is the Bursar, Miss Emma Harris. The Bursar is responsible for all issues relating to Data Protection and any queries should be directed to her.

How long does the School keep your information?

Personal information will be retained in line with the School’s Data Retention Procedure and in accordance with regulatory and statutory legal requirements.

How We Collect Your Information

The School may collect visitors’ personal data in a number of different ways:

- from the information they provide to the School before visiting.
- when visitors communicate with the School by telephone, email or via the School’s website to make enquiries or raise concerns.
- from the information visitors provide to the School when registering with the School as a visitor.

The Categories of Visitor Information the School Collects, Holds and Shares

As part of their visit, the School stores and uses visitor’s personal details and information about their visit. The School may collect the following types of data about visitors:

Personal Information: name, home address, occupation, work address, email address, telephone number, photograph, information concerning dietary needs, vehicle make, type and registration details.

Special Categories: please note that on occasions the School may process “special categories” of information about visitors. This is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of

uniquely identifying a natural person, data concerning health or data concerning a person’s sex life or sexual orientation.

Information that the School will collect and process

As part of your visit to the School, the School stores and uses your personal details and information about your visit for the purposes of managing and operating the School.

The School uses CCTV around its buildings for the purposes of crime prevention, security and health and safety and, accordingly, will capture imagery of visitors to the School.

On reporting to Reception, the School records your name in a sign in app along with vehicle details, check in and out time and who you are on-site to visit.

In the case of regular professional visitors, the school will require evidence that the individual holds an Enhanced Disclosure and Barring Service certificate as well as employer details.

Data category	Short description/Why needed	Legal basis
Personal information about your identity	The School will use data about you to be able to identify you as an individual when at or interacting with the School.	Performance of a contract or Legitimate Interest
Details of your ‘visits’ within the School, including start and end date/times.	Identify you and safely evacuate the school in the event of an emergency. Meet statutory obligations for Safeguarding and Health & Safety.	Performance of a contract or Legitimate Interest
Information confirming you have read and understood the School’s policies and procedures.	To confirm you have read and understood our policies and procedures.	Performance of a contract or Legitimate Interest
Access Control System This includes your name, Company name, your photograph and your access to buildings.	To allow you to access areas of the School that are not open to the public or only available to specific people. To confirm your identity and that you have a relationship with the School. To support the security and management of the estate.	Performance of a contract or Legitimate Interest
Correspondence to and from you (electronic or otherwise).	To keep records.	Legitimate Interest
Accidents and Incidents Reporting	To keep records and to document workplace incidents/accidents and to report certain types of accidents, injuries and dangerous occurrences arising out of its work activity to the relevant enforcing authority	Legitimate Interest

As well as the information listed above there is other information that we may process depending on the nature of your relationship with the School:

Data category	Short description/Why needed	Legal basis
Qualifications and Professional Memberships.	Where specific qualifications and memberships are required for your role.	Performance of a contract or Legitimate Interest
Bank account details	In order to make payments to you	Performance of a contract or Legitimate Interest
Your training record.	To ensure you have the appropriate skills, knowledge, qualifications and/or professional registrations required for your role, including those that are required by law. To support your personal and career development aspirations	Performance of a contract or Legitimate Interest
Information about any medical or health conditions you may have, including your disability status.	To support your engagement with the School and in order to make any reasonable adjustments that are needed.	Performance of a contract or Legitimate Interest
Publicity photographs and/or video/digital images.	To promote your work and/or the work of the School. If you are the subject (i.e. not incidental) to the image you will be asked for your consent.	Consent
Your emergency contact details	To allow us to inform your contacts if you take ill or have an accident at the School.	Legitimate Interests

The legal basis on which the School collects and use your personal information

Except in the circumstances highlighted above, the School processes this information on the basis of its legitimate interests:

- The School has a legitimate interest in wishing to interact with you to manage and operate effectively the School and to ensure that the School is safe and secure for all persons visiting; and
- to be able to do so, the School needs to understand details of who is in the building and to be able to communicate with them.

Where the School are required by law to hold certain records, then the School collects and holds those records to comply with that legal obligation.

How does the School protect your information?

Personal data is stored in line with the School's Record Keeping Policy.

The School has robust technical and organisational systems and policies in place to manage and protect your information. These measures include data encryption, restricted access rights to personal information and up to date security software to ensure confidentiality and to guard against unauthorised access, unlawful processing, accidental loss, damage and destruction.

When this information is no longer required, we will delete your information in accordance with the School's Record Keeping Policy.

Data sharing

In addition to the primary purposes, the School is also legally obliged to share certain data with other public bodies such as HMRC and will do so where the law requires this; the School will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and proportionate.

The School would only disclose information from the access control system, CCTV or visitors register which is required to detect or prevent crime. This is usually on receipt of a Police issued personal data request form, required under Police Investigations Section 29(3) of DPA 1998. There are instances such as prevention of threat to life or serious injuries, where personal information may be provided without a signed police DPA form.

Personal information may be shared between colleagues who legitimately need the information to carry out their duties.

The amount of personal information shared within the School will be no more than is reasonably necessary.

Transfers outside the UK

The School will only transfer data to countries outside the UK when satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy.

Automated Decisions the School makes about you

The School does not make automated decisions using this personal data.

Changes to your personal information

Please tell the School promptly about any changes to the information it holds about you. This is particularly important for your contact details. You can do this by contacting the School Reception.

Your rights

You have the right to request access to, copies of and rectification or (in some cases) erasure of personal data held by the School and can request that we restrict processing or object to processing as well as (in some cases) the right to data portability (i.e. the right to ask us to put your data into a format that it can be transferred easily to a different organisation).

If the School has asked for your consent in order to process your personal data you can withdraw this consent in whole or part at any time. To withdraw consent, please email the Privacy officer, who will explain the consequences of doing so in any particular case and initiate proceedings for withdrawing consent.

Please note that the above rights are not absolute, and the School may be entitled to refuse requests where exceptions apply.

Refusal to Provide Personal Information

Please note that where the School's processing of your personal data relies on your consent and where you then withdraw that consent, the School may not be able to provide all or some aspects of its services to you and/or it may affect the provision of those services to you.

Further information and guidance

If you require more information about how the local authority and/or DfE store and use your personal data please visit www.gov.uk/data-protection-how-we-collect-and-share-research-data

Complaints

If visitors are unhappy with the way the School has processed their personal data they have the right to complain to the Information Commissioner's Office (ICO), but the School asks that visitors raise the issue with the School's Privacy Officer first.

Related Policies

Data Protection Policy

Images and Videos Procedure

Retention of Documents Procedure

Subject Access Request Procedure