

TITLE: ALET Visitor Privacy Policy	REF: GOV005	VERSION: 2
APPROVAL BODY: Policy Committee	DATE: 01/02/2022	REVIEW DATE: 01/02/2023
LEAD PERSON: Data Protection Officer		
VERSION	REVIEWER/APPROVAL	REVIEW NOTES
1.		New Policy
2.	Policy Committee/DP Committee	Full Review

## ALET VISITOR PRIVACY POLICY

### 1. Introduction

Under data protection laws, 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 **individuals who visit our schools**.

We, Activate Learning Education Trust, Oxpens Road, Oxford OX1 1SA 01865 551025, are the 'data controller' for the purposes of data protection law as defined by the UK General Data Protection Regulation and Data Protection Act 2018.

Our data protection officer is Heledd Walker, Head of Governance and Compliance (see 'Contact us' below).

### 2. The personal data we hold

Personal data that we collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Personal information (e.g., name, time on site, reason for visit)
- Other activity information (e.g., Photographs and CCTV images captured, passes created, accidents/incidents while on site).

### 3. Why we use this data

We use the data listed above to:

- a) Enable us to keep you, our students and staff safe.

#### 3.1 Use of your personal data in automated decision making and profiling

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

### 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:

- Legal obligation' basis – we need to process data to meet our responsibilities under law  
e.g., Security and incident reporting.

We do not collect or store any information about you which would constitute 'special category' data under data protection legislation.

## 5. Collecting and storing this data

The information we collect about you is mandatory and must be collected in order for you to access our site.

We keep personal information about you beyond your visit to our school. Our record retention schedule and records management policy set out how long we keep information about staff.

We will retain most of your personal information for a period of 1 year from the date of your visit. Data which we will hold for a different period of time is listed below:

- Accidents or incidents which meet a reporting threshold will be retained for a period of 12 years from the date of the incident
- CCTV images will be retained for a default period of 1 month from the date of the footage, unless this data is used to provide evidence of an incident

## 6. Who we share data with

Where it is legally required, or necessary (and it complies with data protection law), we routinely share personal information about you with:

- Our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Security organisations
- Police forces, courts, tribunals

## 7. Your rights

### 7.1 How to access personal information that we hold about you

Under the data protection regulation, you have the right to request access to their personal information that we hold about you, this would be done via a subject access request.

You have the right to:

- Submit a subject access request.
- Being informed of the identity of the controller, the reasons for processing their personal data and other relevant information necessary to ensure the fair and transparent processing of personal data.
- Object to processing of personal data that is likely to cause or is causing damage or distress.
- Prevent processing for the purpose of direct marketing.
- Object to decisions being taken by automated means.
- In certain circumstances, have inaccurate personal data, rectified, blocked, erased, and destroyed.
- Claim compensation for damages caused by a breach of the data protection regulation.

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 [DPO@alet.org.uk](mailto:DPO@alet.org.uk).

## 8. 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 via [DPO@alet.org.uk](mailto:DPO@alet.org.uk) .

If you feel that your complaint is not adequately resolved, you can make a complaint to the Information Commissioner's Office:

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

## 9. 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**:

Our data protection officer is:

- Heledd Walker [DPO@alet.org.uk](mailto:DPO@alet.org.uk)