



Privacy Notice

Visitors

The Cornerstone Academy Trust needs to collect, store and process data on individuals that visit our premises to be able to maintain security and ensure the safety of our pupils and staff. Only essential data is held and there are clear processes in place that govern how we collect use, store and share the data.

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 privacy notice explains how we collect, store and use your personal data.

We, The Cornerstone Academy Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Kyriaki Constanti. She can be contacted via DPO@tcat.education

The personal data we hold

We process data relating to individuals that visit our schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details including home & email addresses, telephone numbers and other online contact points
- Next of kin and emergency contact numbers
- Photographs for ID purposes
- CCTV footage
- Employer/company information
- Car registration information
- Biometric Data where your consent has been given

Why we use this data

The purpose of processing this data is to help us run the Trust, including to:

- Identify you and keep you safe while on 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 personal information about you when the law allows us to. Most commonly we use it where we need to:

- **Article 6 (c) Legal obligation:** Comply with a legal obligation
- **Article 6 (e) Public Task:** Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests) e.g. in a life or death situation
- We have legitimate interests in processing the data – e.g. where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller as a publicly funded education establishment.

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

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust/school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide 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.

How we store this data

Data stored in paper format is kept securely and is accessible only by the appropriate administrative staff and managers who have a legitimate need to access your data.

Data in electronic format is kept in a secure area on the Trust systems.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Once your involvement in the Trust has ended, we will retain this file and delete the information in it in accordance with our record retention schedule/records management policy.

Data sharing

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 it complies with data protection law) we may share personal information about you 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
- Security organisations
- Health and social welfare organisations
- Polices forces, courts and tribunals
- Professional bodies
- The organisation/company you are representing

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you.

Individuals have a right to make a **Subject Access Request (SAR)** to gain access to personal information that the school holds about them.

If you make a SAR, and if we do hold information about you, we will:

- Give you a description of the information
- 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 contact our data protection officer, Kyriaki Constanti.

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: Kyriaki Constanti.

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: Kyriaki Constanti

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

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**: Kyriaki Constanti.