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.

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 Cornerstone Academy Trust is known as the 'Data Controller' for data protection legislation purposes and is registered with the Information Commissioner's Office (ICO).

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

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.

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, our emergency evacuation procedures and any other information

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.

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

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 School Records Management Policy, which is available on the school website.

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.

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.

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 DPO@tcat.education

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 information, however if we have not met your expectations, please let us know so we can put things right. To make a complaint, please complete our Data Protection Complaints Form, available on our website or directly via the link below:

Data Protection Complaints Form - The Cornerstone Academy Trust

If you 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

You are not required to pay a charge for exercising your rights and we have one calendar month to respond to you, which can be extended by up to a further two calendar months for complex requests. Please bear in mind that this may be difficult for us to achieve should you submit your request 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 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 please contact our Data Protection Liaison Officer.

Further information about your data protection rights, can be found on the Information

Commissioner's Office website at www.ico.org.

Updates to this Notice

Reviewed by (job role):	**Date:**	**Next Review Date:**
Full Trust Board	February 2024	February 2026
DPO / DPLO	24 February 2026	February 2028