



Visitor Privacy Notice

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1 Introduction

Yarrow Heights School (“YHS”, “we”, “us”, “our”) are committed to protecting the privacy and security of the personal data we collect from visitors to our school (“you”, “your”). We are further committed to ensuring we meet our legal obligations when processing your personal data.

The purpose of this privacy notice is to explain what personal data we collect about you during your visit to the school, why we collect it and how we use it. Yarrow Heights School is data controller, registered in the UK with the Information Commissioner’s Office (“ICO”), registration number ZA915011.

This privacy notice applies to all visitors to our school. It is important that you read this notice, so that you are aware of how and why we are using your personal data.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices, and to the products and services we offer. When changes are made, we will amend the date on the first page of this document.

2 Personal data

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

3 Categories of personal data we collect

The categories of personal data we collect, use, store and share (when appropriate) about you may include, but is not restricted to:

- Name
- Contact details (address, telephone number(s), email address)
- Photographs for identification purposes
- Information relating to the visit, e.g. company or organisation name, arrival and departure time, car registration number
- On-site security CCTV images

We may also collect, use, store and share (when appropriate) information about you that falls into the “special category” of more sensitive personal data. This may include, but is not restricted to:



- Information about any medical conditions or disabilities, to ensure suitable access arrangements are in place to facilitate your visit and to ensure your health and safety in the school are maintained at all times.

We will only process the “special categories” of more sensitive personal data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or asking for your explicit consent.

We may also hold data about you that we have received from other organisations or establishments including academies, schools, colleges, and external agencies such as social services. We do not collect any personal data you would not expect us to collect, and we will not collect any personal data we do not need.

4 Why we use your data

We use the data listed above to:

- Identify you and keep you safe while on the school site
- Keep students and staff safe
- Maintain accurate records of visits to the school, for the purposes of Health and Safety
- Provide appropriate access arrangements

We collect your personal data for the purposes of security and health and safety, allowing us to fully document who is on site at any given time, and why.

4.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or ‘opt out’ of receiving these emails and/or texts at any time by clicking on the ‘Unsubscribe’ link at the bottom of any such communication, or by emailing richard.young@yarrowheights.com.

4.2 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 in order to explain the processing to you, including your right to object to it.



5 Purposes and bases for using your personal data

We will only use your personal data when the law allows. Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for the purposes of carrying out a task in the public interest
- Where we need to comply with a legal obligation
- We may also use your data in the following situations, which are likely to be rare:
 - With your consent/explicit consent
 - Where we need to protect your vital interests (or someone else’s interests)

We may use your personal data for the following purposes and on the following lawful bases:

| Purpose | Lawful Bases for Processing |
|--|---|
| Identification of, and ensuring the safety of, all visitors to our school. | <p>Identification of all visitors to our school is a task carried out in the public interest.</p> <p>It is necessary to meet our legal obligation to ensure your health and safety while on school property.</p> <p>When processing your special category data, we do so with your explicit consent, or in your vital interest if unable to give consent.</p> |
| Provide appropriate access arrangements. | <p>We have a legal obligation to provide appropriate access arrangements to ensure your visit is as safe as possible.</p> <p>When processing your special category data, we do so with your explicit consent, or in your vital interest if unable to give consent.</p> |
| Emergency health and welfare reporting to emergency services and other interested parties. | <p>It is necessary to meet our legal obligation to ensure your health and safety while on school property and to report related incidents.</p> |



| | |
|--|--|
| | When processing your special category data, we do so with your explicit consent, or in your vital interest if unable to give consent. |
| Ensuring the health and safety of staff and students while on school property. | <p>We process your personal data as we have a legal obligation to ensure the health and safety of staff and students while on school property</p> <p>When processing your special category data, we do so with your explicit consent, or in your vital interest if unable to give consent.</p> |
| Maintain accurate records of visits to our school. | <p>We have a legal obligation to maintain accurate records of visits to our school.</p> <p>We must also maintain accurate records of all visitors to our school as we are performing a task in the public interest.</p> <p>When processing your special category data, we do so with your explicit consent, or in your vital interest if unable to give consent.</p> |

6 Collecting your data

While the majority of information we collect about you is compulsory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether providing it is compulsory or optional. If it is compulsory, we will explain the possible consequences of not complying.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals



7 How we store your data

We keep personal information about you while you are visiting our school. We may also keep it beyond your visit with us if this is necessary. Our Data Retention and Destruction Policy and Schedule sets out how long we keep information about you.

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 and we will dispose of your personal data securely when we no longer need it.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8 Sharing your data

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 safeguarding concerns
- Government departments or agencies
- Our regulator
- Suppliers and service providers
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals



9 How do we protect personal data

YHS takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of the data.

10 Data subject rights

You have certain rights in relation to the processing of your personal data, including to:

- **Request access** to your personal data (commonly known as a “Subject Access Request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- **Request rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal data to another party (data portability)

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received 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 or legal requirement for doing so.

How to exercise your rights

If you wish to exercise your rights, please email richard.young@yarrowheights.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 How to complain

Data subjects in the UK/EU have the right to lodge a complaint with a supervisory authority, if you believe we are infringing UK/EU data protection laws. You have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

12 Contact

You can contact us in relation to this privacy notice by emailing richard.young@yarrowheights.com.