

Privacy Notice for Visitors

Person responsible for this document:	
Compliance Department	
Reviewed by:	Date:
L Duke	Jan 2024
Approved by:	Date:
J Culham	Jan 2024
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Under data protection law, individuals have a right to be informed about how the University of Kent Academies Trust (UKAT) 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 data about visitors to our Academies in the Trust.

Our Trust, University of Kent Academies Trust (UKAT), Marlborough Road, Gillingham, Kent, ME7 5HT, telephone 01634 852341, is the 'data controller' for the purposes of data protection law.

Our data protection officer is Julia Culham (see 'Contact us' below).

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about visitors:

- Name, car registration number
- Address
- Contact details and contact preferences
- Date of birth, marital status and gender
- Car registration
- If a regular professional visitor, evidence that the individual holds an Enhanced Disclosure and Barring Service certificate
- Employer details
- Photographs
- CCTV images captured in/around the academies

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Disability, health and access requirements

Why we use this data

We use the data listed above to:

- Identify you and keep you safe while on the Academy sites
- Keep students and staff safe
- Protect the Academy sites
- To protect our network
- Maintain accurate records of visits to UKAT Academies
- Provide appropriate access arrangements

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 Trust 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 contacting us (see 'Contact us' below).

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.

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:

- We need to comply with a legal obligation

Less commonly, we may also process visitors' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)
- Where we have obtained consent to use visitors' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.
- Some of the reasons listed above for collecting and using visitors' personal data overlap, and there may be several grounds which justify our use of this data.

Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physical or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentially under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public to you
- We need to process it for reasons of substantial public interest as defined in legislation

Collecting this data

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

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.

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

How we store this data

We keep personal information about you while you are visiting our academies. We may also keep it beyond your visit with our academies if this is necessary. Our Records Retention Policy and schedule sets out how long we keep information about visitors.

You can request a copy of the UKAT Records Retention Policy and Schedule from the Academy Reception.

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.

How do we process your Personal Data?

We comply with our obligations under GDPR in the following ways:

- By keeping Personal Data up to date
- By storing and destroying it securely
- By not collecting or retaining unnecessary or excessive amounts of data
- By protecting Personal Data from loss, misuse, unauthorised access, and disclosure;
- By ensuring that appropriate technical measures are in place to protect Personal Data.

Who we share data with

We do not share information about you with any third party without 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:

Security organisations– to ensure the safety and welfare of pupils, staff and visitors ·
Emergency Services – to ensure the safety and welfare of visitors and to meet any legal obligations and to ensure the safety of the whole school community.

- 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

What is the legal basis for processing your personal data?

We are under a legal obligation to process certain personal information relating to our members for the purpose of complying with our obligations.

- To maintain a register of our members.

Sharing your personal data

Your Personal Data will be treated as strictly confidential and will be shared only with organisations whose services are required in order to provide the services we offer.

We will only share your Personal Data with other third parties with your consent. These third parties, in turn, may rely on data processors to provide services that help them help us.

When you give your consent to our holding of your Personal data you agree to us sharing your Personal Data (including special categories of Personal Data – where we have your explicit consent) with third party processors and sub-processors.

How long do we keep your Personal Data?

We keep your Personal Data for as long as you are a member of the Associates. We will securely destroy all personal data once we have used it and no longer need it.

Your rights and your Personal Data

Unless we have an exemption under GDPR, you have the following rights with respect to your Personal Data: –

- The right to request a copy of the Personal Data which we hold about you, without any charge
- The right to request that we correct any Personal Data found to be inaccurate or out of date
- The right to request that your Personal Data is erased where it is no longer necessary for us to keep it
- The right to withdraw your consent to the processing we carry out at any time
- The right to request that we provide you with your Personal Data and, where possible, to send that data directly to another data controller
- The right, where there is a dispute in relation to the accuracy or processing of your Personal Data, to ask us to restrict further processing
- The right to object to the processing of Personal Data
- The right to lodge a complaint with the Information Commissioners Office and to seek legal recourse

Further processing

If we wish to use your Personal Data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use. We will do this before we start processing for the new use. We will set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. Further information can be accessed on the ICO website <https://ico.org.uk/>

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.

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: Julia Culham at compliance@universityofkentacademiestrust.org.uk.