

Visitor Privacy Notice



COOMBE HOUSE
SCHOOL

Notice owner:	Quality Assurance Officer	Adoption Date: June 2023
Approved by company:	Managing Director	
Review cycle:	Annual	
Last reviewed on:	April 2024	
Changes made:	Annual Review	
Next review due by:	April 2025	



Dorset
Centre of
Excellence

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1. The purpose of this notice

Under UK data protection law, individuals have a right to be informed about how we use 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 visitors to Coombe House School (the "School") and Dorset Centre of Excellence (the "Company"), who are required to sign in at Reception using the visitor management system InVentry.

2. Identity and contact details of the data controller

The data controller responsible in accordance with the purposes of the UK General Data Protection Regulation (UK GDPR) and other data protection regulations is:

Dorset Centre of Excellence Limited
Donhead St Mary
Shaftesbury
SP7 9LP

Telephone: 01747 449 844

Email: office@dorsetcentreofexcellence.org.uk

www.dorsetcentreofexcellence.org.uk

www.coombehouseschool.org.uk

The Company is registered with the Information Commissioner's Office (ICO) under number: ZB244508.

3. Contact details of the senior responsible individual (SRI)

The contact details of the designated senior responsible individual (SRI) for the Company are listed below:

Managing Director
Dorset Centre of Excellence Limited
Donhead St Mary
Shaftesbury
SP7 9LP

Email: dpo@dorsetcentreofexcellence.org.uk

The Company's Quality Assurance Officer is responsible for overseeing the implementation of this notice, monitoring our compliance with data protection law, and developing related procedures and guidelines where applicable. They are also the first point of contact for individuals whose data the company processes, and for the ICO.

4. Categories of visitor information that we collect and process

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

- Name
- Contact details
- Information relating to the visit, e.g., company or organisation name, arrival and departure time, and vehicle registration number.
- If a regular professional visitor, evidence that the individual holds an Enhanced Disclosure and Barring Service certificate.
- Photographs for identification purposes
- CCTV images captured on the property grounds

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

- Disability, health and access requirements.

We may also hold data about you that we have received from other organisation's, including other schools and social services.

5. The purpose for visitor information being used

We use the information listed above for the following purposes:

- to identify you and keep you safe whilst visiting the site
- to keep children / young people and staff safe
- to maintain accurate records of visits to the School and Company
- to 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 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 visitors' 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.

6. Our lawful basis for using this data

What do we mean by 'lawful basis'?

We are only able to use your personal data when the law allows us to. This is called lawful basis. Regarding the above purposes, the lawful basis listed for each are explained below:

Purpose your data is used	Type of data used	Lawful basis
To identify you and keep you safe whilst visiting the site.	<ul style="list-style-type: none"> Name Contact details Information relating to your visit (company/organisation name, arrival and departure time, vehicle registration number) Evidence of Disclosure and Baring certificate or other ID documents Photograph for ID badge CCTV images Disability, health and access requirements 	<p>UK GDPR Article 6 (e) - 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 and</p> <p>UK GDPR Article 9 (a) – We have your consent.</p>
To keep children/young people and staff safe.	<ul style="list-style-type: none"> Name Contact details Information relating to your visit (company/organisation name, arrival and departure time, vehicle registration number) Evidence of Disclosure and Baring certificate or other ID documents Photograph for ID badge CCTV images 	<p>UK GDPR Article 6 (e) - 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.</p>
To maintain accurate records of visits to the School and Company	<ul style="list-style-type: none"> Name Contact details Information relating to your visit (company/organisation name, arrival and departure time, vehicle registration number) Evidence of Disclosure and Baring certificate or other ID documents 	<p>UK GDPR Article 6 (e) - 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.</p>

To provide you with appropriate access arrangements	<ul style="list-style-type: none"> • Name • Contact details • Information relating to your visit (company/organisation name, arrival and departure time, vehicle registration number) • Disability, health and access arrangements 	UK GDPR Article 6 (e) - 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 and UK GDPR Article 9 (a) – We have your consent.
To inform you of events, campaigns, charitable causes or services that may be of interest to you.	<ul style="list-style-type: none"> • Name • Contact details • Company/organisation name 	UK GDPR Article 6 (a) – We have your consent.

We are subject to a wide range of laws which we must comply with to safeguard the wellbeing of our children / young people, and to carry out the public tasks vested in us as a school. We only process personal information as far as is necessary to meet those obligations.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would 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 processing of your data.

7. Our basis for using special category data

Special category data is personal data that needs more protection because it is sensitive. For example, data concerning health or racial / ethnic origin.

For ‘special category’ data, we only collect and use it when we have both a lawful basis and one of the following conditions for processing as set out in UK 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 are physically 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 confidentiality 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; or
- 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 and a condition for processing as set out in UK 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 are physically or legally incapable of giving consent;
- the data concerned has already been made manifestly public by you;
- we need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights; or
- we need to process it for reasons of substantial public interest as defined in legislation

8. Collecting and storing visitor information

We collect visitor information ahead of your visit or on the day of the visit, and store this information in InVentry (our visitor management system). This information can be collected through the following methods:

- directly through the InVentry system;
- by email or
- by telephone.

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.

We will only collect the data that we need in order to fulfil our purposes, which are set out above. We keep personal information about you while you are visiting our premises and may also keep it beyond your visit if this is necessary, to comply with our legal obligations. Our Data Retention and Disposal procedure and guidance sets out how long we keep information about visitors. You can request a copy of our guidance by contacting us.

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.

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

9. Who we share your 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 UK 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 visitor information is relevant to a safeguarding concern;
- the Department for Education;
- central and local government;
- Ofsted;

- educators and examining bodies;
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as catering provision or the visitor management system (InVentry);
- 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 or tribunals – to assist them discharging their legal duties;
- professional bodies; or
- the organisation/company you are representing.

We will only share personal data where necessary and will ensure that only the minimal amount of personal data is shared to fulfil the purpose of the sharing.

Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

10. Closed Circuit Television (CCTV)

The Company uses CCTV images to reduce crime and to monitor buildings in order to provide a safe and secure environment for our children / young people, staff and visitors, and to prevent the loss or damage to the property.

The coverage of the CCTV system is positioned away from the buildings and restricted to the surrounding grounds. It is not used inside any buildings, including classrooms and toilets.

For further information on our CCTV system and who images may be shared with, please refer to the 'Contact us' section at the end of this notice.

11. Your rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. This is sometimes referred to as a 'subject access request'.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- give you a description of it;
- 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; and
- 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 us (see 'Contact us' below).

Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- to object to our use of your personal data (see below);
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;
- to not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you;
- to have your personal data rectified, if it is inaccurate or incomplete;
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose (see below); and
- Make a complaint to the Information Commissioner's Office (see below).

The right to object

You have the right to object to us processing your personal data at any time. However, this will only apply in certain circumstances. You can object if we are using your data for the following:

- for a task carried out in the public interest;
- for the exercise of official authority;
- for our legitimate interests;
- for scientific or historical research, or statistical purposes; or
- for direct marketing purposes.

We cannot refuse your objection to using your personal data for direct marketing purposes. However, if you have objected to other uses of your personal data we can refuse to comply with

your objection if we have a strong reason to continue processing your data. For further information on the right to object, please refer to the ICO guidance <https://ico.org.uk/for-the-public/the-right-to-object-to-the-use-of-your-data/>.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

The right to withdraw consent

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please contact us.

The right to lodge a complaint

If you are unhappy with any aspect of this privacy notice, or how your personal data is being processed, please contact us (see 'Contact us' below).

If you are still not happy, you have the right to lodge a complaint with the ICO. Their details are listed below:

- 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

Your rights will differ depending on the lawful basis for the processing of your personal information. For further information on your rights, please refer to the ICO guidance <https://ico.org.uk/for-the-public>.

To exercise any of these rights, please contact us (see 'Contact us' below).

12. How long will we hold visitor information for

We will hold visitor information for a period of time as detailed within our Data Retention and Disposal procedure and guidance. The length of time will depend on the nature of the information held. Data is only stored for as long as necessary to complete the task for which it was originally collected.

13. Contact us

If you would like to discuss anything in this privacy notice, please contact our Quality Assurance Officer by email at: dpo@dorsetcentreofexcellence.org.uk.

14. Updates to this privacy notice

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in April 2024.

15. Version control

Date of adoption of this notice, by or on behalf of the Proprietor	June 2023
Date of last review of this notice	April 2024
Date for next review of this notice	April 2025
Notice owner (Proprietor)	Dorset Centre of Excellence