

Visitor Privacy Notice



COOMBE HOUSE
SCHOOL

Notice owner:	Governance and GDPR Lead	Adoption Date: June 2023
Approved by company:	Managing Director	
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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 their personal data is used. In order to comply with this right, 'privacy notices' (sometimes called 'fair processing notices') are provided to individuals where their personal data is being processed.

This privacy notice explains how personal data is collected, stored and used 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: reception@coombehouse.org.uk

www.dorsetcentreofexcellence.org.uk

www.coombehouseschool.org.uk

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

As the controller of the personal data processed, the Company is responsible for deciding how information is collected, used and stored.

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

The contact details of the designated senior responsible individual (SRI) are as follows:

Managing Director
Dorset Centre of Excellence Limited
Donhead St Mary
Shaftesbury
SP7 9LP
Email: dpo@coombehouse.org.uk

The Quality Assurance Lead is responsible for overseeing the implementation of this notice, monitoring compliance with data protection law, and developing related procedures and guidelines where applicable. The Governance and GDPR Lead is the first point of contact for individuals whose data the company processes, and for the ICO.

4. Categories of visitor information collected and processed

The personal data that may be collected, used, stored and shared (when appropriate) about visitors 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.

Information may also be collected, used, stored and shared (when appropriate) which falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Disability, health and access requirements.

Data may also be held which has been received from other organisation's, including other schools and social services.

5. The purpose for visitor information being used

The information listed above is used for the following purposes:

- To identify visitors, and keep them 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
- To inform visitors of events, campaigns, charitable causes or services that may be of interest

Use of personal data for marketing purposes

Where visitors have given consent to do so, marketing information may be sent by email or text promoting events, campaigns, charitable causes or services that may be of interest to them.

Individuals 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 personal data in automated decision making and profiling

Visitors' personal data is not processed through automated decision making or profiling. If this changes in the future, any relevant privacy notices will be amended in order to explain the processing, including the right to object to it.

6. The lawful basis for using this data

What is meant by 'lawful basis'?

Personal data can only be used when the law allows it. This is called lawful basis. Regarding the above purposes, the lawful basis listed for each are explained below:

Purpose data is used	Type of data used	Lawful basis
To identify visitors, and keep them safe whilst visiting the site.	• Name • Contact details • Information relating to the 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	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) – Consent has been obtained.
To keep children / young people and staff safe.	• Name • Contact details • Information relating to the 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	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.
To maintain accurate records of visits to the School and Company	• Name • Contact details	UK GDPR Article 6 (e) - Processing is necessary for the performance of a task carried out in the public interest

	- Information relating to the visit (company/organisation name, arrival and departure time, vehicle registration number) - Evidence of Disclosure and Baring certificate or other ID documents	or in the exercise of official authority vested in the controller.
To provide appropriate access arrangements	- Name - Contact details - Information relating to the 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) – Consent has been obtained.
To inform you of events, campaigns, charitable causes or services that may be of interest to you.	- Name - Contact details - Company/organisation name	UK GDPR Article 6 (a) – Consent has been obtained.

There are a wide range of laws which must be complied with to safeguard the wellbeing of children / young people, and to carry out the public tasks vested in the School. Personal information is only processed as far as is necessary to meet those obligations.

Where consent to use this personal data has been provided, this may be withdrawn at any time. This will be made clear when requesting visitors consent, and the process of how to go about withdrawing this consent will be explained.

Some of the reasons listed above for collecting and using visitors personal information overlap, and there may be several grounds which justify the processing of the data.

7. The 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, this is only collected and used when there is both a lawful basis and one of the following conditions for processing as set out in UK data protection law:

- Explicit consent has been obtained to use the personal data in a certain way.
- To perform or exercise an obligation or right in relation to employment, social security or social protection law.

- To protect an individual's vital interests (i.e. protect their life or someone else's life), in situations where they are physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by the individual.
- It is needed to process it for the establishment, exercise or defence of legal claims.
- To process it for reasons of substantial public interest as defined in legislation.
- 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.
- 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.
- 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, this will only be collected and used it when there is both a lawful basis and a condition for processing as set out in UK data protection law. Conditions include:

- Consent to use it in a specific way has been obtained.
- To protect an individual's vital interests (i.e. protect their life or someone else's life), in situations where they are physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by the individual.
- To process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights.
- To process it for reasons of substantial public interest as defined in legislation.

8. Collecting and storing visitor information

Visitor information is collected ahead of the visit or on the day of the visit, and this information is stored in InVentry (visitor management system). This information can be collected through the following methods:

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

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

When information about an individual is sought, it is made clear whether they must provide this information (and if so, what the possible consequences are of not complying), or whether there is a choice.

Data will only be collected in order to fulfil the purposes, which are set out above. Visitors' personal information is kept whilst they are visiting the premises and may also be kept beyond the visit if this is necessary, to comply with the Company's legal obligations. The

Company Data Retention and Disposal procedure and guidance sets out how long information is kept about visitors. A copy of our guidance can be requested by contacting us.

Appropriate security measures have been put in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Personal data will be disposed of securely when it is no longer required.

9. Who data is shared with

Personal information is not shared with any third party without consent unless the law and the Company / School policies allow this.

Where it is legally required, or necessary (and it complies with UK data protection law), personal information may be shared with:

- The local authority – to meet the legal obligations to share certain information with it, such as where visitor information is relevant to a safeguarding concern.
- The Department for Education.
- The Central and local government.
- Ofsted.
- Educators and examining bodies.
- Suppliers and service providers – to enable them to provide the service that they have been contracted for, such as catering provision or the visitor management system (InVentry).
- 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.
- The organisation / company the visitor is representing.

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

Transferring data internationally

Where personal data is transferred to a third-party country or territory, this will be done so in accordance with UK data protection law.

In cases where safeguarding arrangements have to be set up to complete this transfer, a copy of these arrangements can be requested 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 the 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 the CCTV system and who images may be shared with, please refer to the 'Contact us' section at the end of this notice.

11. Individual's rights

Requesting access to personal data

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

If an individual makes a subject access request, and if the Company do hold information about them, the Company will (subject to any exemptions that may apply):

- Give the individual a description of it.
- Tell them why it is being held and processed, and how long it will be kept for.
- Explain where they got it from, if not from the individual.
- Tell them who it has been, or will be, shared with.
- Let the individual know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give them a copy of the information in an intelligible form.

The individual may also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If an individual would like to make a request, please contact the Company (see 'Contact us' below).

Other rights regarding personal data

Under data protection law, individual's have certain rights regarding how their personal data is used and kept safe. For example, they have the right to:

- Object to the use of the personal data (see below).
- Object to direct marketing (including profiling) and processing for the purposes of scientific / historical research and statistics.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on them.
- Have their personal data rectified, if it is inaccurate or incomplete.
- Restrict the processing of their personal data (i.e. permitting its storage but no further processing).
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Withdraw their consent, where this was previously provided for the collection, processing and transfer of the personal data for a specific purpose (see below).
- Make a complaint to the Information Commissioner's Office (see below).

The right to object

Individual's have the right to object to the processing of their personal data at any time. However, this will only apply in certain circumstances. They can object if the data is being used for the following:

- For a task carried out in the public interest.
- For the exercise of official authority.
- For the Company's legitimate interests.
- For scientific or historical research, or statistical purposes.
- For direct marketing purposes.

The Company cannot refuse the objection to using personal data for direct marketing purposes. However, if the individual has objected to other uses of their personal data the Company can refuse to comply with their objection if there is a strong reason to continue processing the 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 an individual has a concern or complaint about the way their personal data is being collected or used, they should raise a concern with the Company in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

The right to withdraw consent

Where the personal data is being processed with consent, an individual has the right to withdraw that consent. If they change their mind, or are unhappy with the use of their personal data, they should contact the Company.

The right to lodge a complaint

If an individual is unhappy with any aspect of this privacy notice, or how their personal data is being processed, please contact the Company (see 'Contact us' below).

If the Company has not been able to resolve the matter, then the individual has 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

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

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

12. How long will visitor information be held for

Visitor information will be held for a period of time as detailed within the 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

To discuss anything in this privacy notice, please contact the Governance and GDPR Lead by email at: dpo@coombehouse.org.uk.

14. Updates to this privacy notice

This privacy notice may need to be updated periodically so it is recommended that this information be revisited from time to time. This version was last updated in June 2025.

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	June 2025
Date for next review of this notice	June 2026
Notice owner (Proprietor)	Dorset Centre of Excellence