

INVICTUS

Education Trust

Visitors Privacy Notice

This Privacy Notice has been written to inform visitors to our Trust and our schools about what we do with your personal information that we record each time you visit the site. This privacy notice is aimed at occasional and professional visitors to the Trust and our school, who are required to sign in using our visitor systems.

Who are we?

Invictus Education Trust is a 'Data Controller' as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with the UK GDPR and to oversee data protection procedures. If you would like to discuss anything in this privacy notice, please contact the Trust's Senior Information Risk Owner Emma Myers by email emyers@invictus.education or Veritau Ltd. Veritau's contact details are:

Schools Data Protection Officer
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL
schoolsDPO@veritau.co.uk
01904 554025



Please ensure you include the name of your Trust in all correspondence

What information do we collect?

The categories of information that we collect, hold and share include the following:

- Name
- Company details (if appropriate)
- Purpose of visit
- Contact details (email address, telephone number)
- Car registration number (if appropriate)
- Assistance required in the case of emergency (if appropriate)
- Photo

We may also process certain 'special category' data about our visitors including:

- Disability, health and access requirements

No special category data will be specifically recorded and processed against your visit. However, there is a risk that some special category data will be captured in photographs taken.

Why do we collect your personal data?

We use the information we collect:

- To meet statutory obligations for Safeguarding our pupils/students;
- To ensure a safe and secure environment for all staff and visitors;
- To meet our statutory obligations for Health and Safety;
- Identify you and safely evacuate the school in the event of an emergency.

What is our lawful basis for processing your personal data?

Any personal data that we process about our visitors is done so in accordance with Article 6 and Article 9 of the UK GDPR:

Our legal basis for processing your personal data, in line with Article 6(1)(c) – legal obligation; 6(1)(e) – to carry out a task in the public interest and 6(1)(f) - where we have legitimate interests in processing the data – for example, the use of photographs to enable us to clearly identify you in the event of an emergency evacuation

Less commonly, we may also use personal information about you in line with Article 6(1)(a) – consent and 6(1)(d) – vital interest.

Article 9(2)(g) – substantial public interest; DPA 2018 Part 2, Schedule 1 – Condition 18

Who do we obtain your information from?

Much of the information we process will be obtained directly from you. We will also process information received from:

- Your company or organisation

Who do we share your personal data with?

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:

- Local authority – if we have any concerns over safeguarding
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as visitor management systems
- Police forces, courts – to assist them discharging their legal duties
- Emergency Services – to ensure the safety and welfare of visitors and to meet any legal obligations
- Insurance – to defend a legal claim, or record an accident/incident

How long do we keep your personal data for?

We retain your information in accordance with our retention schedule or as long as we are required to by law.

We maintain a visitor management system to store personal information about all visitors. The information contained in this file is kept secure and is only used for purposes directly relevant to work with the Trust.

Generally, this information is held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If we do need to send your data out of the European Economic Area it will ensure it has extra protection from loss or unauthorised access.

When this information is no longer required, we will delete your information in accordance with our retention schedule.

What rights do you have over your data?

Under the UK GDPR data subjects have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF icocasework@ico.org.uk / 0303 123 1113

Last updated

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 on 27 June 2022.