

Privacy Notice – Visitors

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Document owner: Fir Tree College

A: The Nook, Appley Bridge, Wigan, WN6 9JB

T: 01257 251 502 | E: info@firtreecollege.com



Introduction

Fir Tree College must collect and process personal information (data) about you when you visit our site in order to effectively manage your visit and to meet the legal obligations placed upon us as an organisation and education provider.

To meet our obligations under the UK General Data Protection Regulation (UK-GDPR), we must inform you about how and why we process your personal data; this information is outlined in the following privacy notice.

Data Controller

The college is the 'Data Controller' for the personal information that we process about you when you visit our site. This means that we are responsible for your data and make decisions on how it is used.

Data Protection Officer

The college has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the college and acts as the first point of contact for any questions or queries regarding data protection.

Our DPO is Miss Danielle Eadie from RADCaT Ltd who is supported by Senior Leadership Team (SLT) at the college. The DPO is contactable via the college office in the first instance.

What personal data do we process about you and why we need it?

All visitors arriving at our site must provide us with the following information. We will ask you to input this information directly on the screen at reception:

- Full Name
- Reason for Visit
- Vehicle Registration

Once these details have been inputted, our visitor system will prompt you to take an image of yourself which will be used to automatically create your ID badge. Our visitor system will also log your sign in and out times.

We need this information to effectively manage your visit and to keep you and members of the college community safe whilst on site.

Depending on the nature of your visit, we may also ask that you provide us with DBS information to meet our safeguarding obligations.

CCTV

Closed Circuit Television (CCTV) is in place on our site and will capture images of you when you visit us; some of our internal cameras also record sound. Our system records automatically on a 24/7 basis.

We use CCTV for the following purposes:

- Keep our premises and members of the college community and wider public safe
- Prevent and detect crime and assist in apprehending offenders
- Review and evidence any instances of inappropriate behaviour on site

To maintain your privacy as much as reasonably practicable, we do not routinely monitor the footage and will only access the recordings if we are notified of an incident.

Special Category Data

Information about you that is much more sensitive in nature is referred to as special category data. Examples include health data and special characteristics about a person such as their gender, ethnicity and religion.

We do not process special category data about you unless one of the following scenarios occurs:

- You inform us of a disability or medical condition that may impact your visit
- An accident occurs that you are party to and we must administer first aid or seek medical attention

Accidents & Incidents

In the event that an accident or incident occurs whilst you are visiting our site, we may be required to process your personal data (including special categories) to keep you and others safe. For example:

- Share your data with the emergency services
- Record details of accidents and incidents to meet our regulatory requirements (health & safety etc)
- Process data relating to accidents and incidents for the enactment or defence of a legal claim.

Lawful Bases and Purposes for Processing

Under the UK-GDPR, the college must have a lawful basis to process your personal data. Your data is primarily processed as a visitor as we have a **legal obligation** to do so. This essentially means that we are required by law to collect and process your information in the following ways:

Safeguarding

- Keeping Children Safe in Education (KCSIE) (2024): requires the college to perform vetting and identification checks on those visitors that may be working alone or directly with children. Under this statutory guidance, the Department for Education (DfE) require the college to log visitor details and checks made on its 'single central record' as evidence of compliance.
- Safeguarding Vulnerable Groups Act (2006) requires that we follow the same process in respect of vulnerable adults.

Health & Safety

- The Health and Safety at Work Act (1974) poses a number of regulatory requirements on organisations to keep those on site safe. For instance, we must keep a live log of who is on site in the event of a fire. We must also ensure a safe environment for those visitors that have disabilities and medical conditions that may impact their visit.

Legal Claims

- In the event that the college is subject to a legal claim to which you are a party to as a result of an accident or incident, we may need to process your personal data in the enactment or defence of that claim.

Further lawful bases...

We use CCTV to enhance site security, keep members of the college community safe and to aid in the prevention and detection of crime. We are **performing a task in the interest of the public**.

In the unlikely event that an emergency situation occurs on site and we need to process your personal data in the act of protecting or saving the life of you or someone else, we have a **vital interest** to do so.

With regards to special category data, we are required to meet an additional lawful basis. If we must process your special category data, we anticipate that the processing will fall under reasons of **substantial public interest**.

How long we keep your data?

To comply with the UK-GDPR, the college only keep personal data for as long as necessary to meet our legal and operational duties. As a rule of thumb, we will retain general visitor records for up to 1 year unless we have a legal reason to keep them for longer.

How we store and keep your data secure?

For the most part, your data is stored in electronic format on site as part of our visitor system which is fully encrypted. In the event that we must keep any paper records, we will ensure that these are kept securely in a locked cabinet.

Access to records is strictly limited on a need to know basis; all staff are subject to vetting checks and confidentiality agreements. If we must transfer your data to third parties, we will ensure this is done so using secure transfer methods.

Who we share your personal information with?

The college will only share your personal data if it is required to meet a legal obligation or an operational duty relating to visitor management. We anticipate that visitor data will only be shared in a small number of scenarios:

- We are subject to a statutory audit (Ofsted etc) and must disclose records to the auditor to assess our compliance and fair recruitment practices
- An accident or incident occurs that you are party to and we must share data to meet a legal obligation and / or keep you or another person safe. Parties in such instances may include:
 - Local Authority of Government Departments
 - Police & Emergency Services
 - Governing Bodies (HSE, ICO etc)

- Professional Advisors
- Insurance Provider
- Courts

In circumstances where we must share your data, we will ensure that it is limited to what is strictly necessary and sent via secure transfer methods.

We do not transfer your personal data outside of the UK. If a situation arises in which we must do so, we will ensure the relevant safeguards are in place to comply with data protection law.

What are your rights?

All individuals have the following rights in respect of their own personal data in certain circumstances:

- The right to be informed about how and why we process your personal data
- The right to access and ask for copies of the personal data we hold about you
- The right to ask that we rectify any personal data you feel is inaccurate or incomplete
- The right to object to the processing of your personal data in certain circumstances
- The right to ask us to erase the personal data that we hold about you in certain circumstances
- The right to ask us to restrict the processing of your personal data
- The right to ask that we transfer your personal to another controller via automated means (data portability)
- The right to ask that your personal data is not subject to automated decision making and profiling

Please contact the college office if you would like to exercise any of these rights. A response will be provided to you within one calendar month; the college reserves the right to extend more complex requests by a further two months, we will however notify you of any intention to extend within the first month.

Our 'Data Protection Policy' is available on our website if you would like further information on your rights.

Complaints

If you have any concerns about how and why we process your personal data, please contact us in the first instance so that we can resolve any issues accordingly.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

ICO: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>