



*Elmley Dray  
School*

## Privacy Notice Visitors

### Introduction

Under UK data protection law, individuals have a right to be informed about how our school 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 personal data about visitors to the school.

We, Elmley Dray School, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is David Baines (see 'Contact us' below).

### The personal data we hold

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 number plate
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

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:

- Information about any access arrangements that may be required

- Photographs for identification purposes
- CCTV images captured in school

We may also process limited identity verification data where required for safeguarding or legal compliance purposes.

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

### **Why we use this data**

We use the data listed above to:

- a) Identify you and keep you safe while on the school site
- b) Keep pupils and staff safe
- c) Maintain accurate records of visits to the school
- d) Provide appropriate access arrangements
- e) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

We also use this data to meet updated safeguarding, security and accountability obligations under UK law, including proportionate monitoring and incident response requirements introduced from 2025 onwards.

### **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 school 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 contacting us (see 'Contact us' below).

We will ensure that consent mechanisms meet strengthened standards for clarity and affirmative action under the Data (Use and Access) Act 2025.

### **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.

Should this change, we will provide clear information about the logic involved, the significance and potential consequences of such processing, and your rights in line with updated legal requirements.

### **Use of your personal data for filtering and monitoring purposes**

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. safeguarding, child and vulnerable adult protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

Monitoring is carried out in a proportionate and privacy-conscious manner, with safeguards in place to protect individual rights in line with current legislation.

### **Our lawful basis for using this data**

Our lawful bases for processing your personal data for the purposes listed above are as follows:

- In accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a school as set out by legislation / guidance
- In accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- In accordance with the 'consent' basis – we will obtain consent from you to use your child's personal data
- In accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- In accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason

Where we rely on legitimate interests, we carry out and document a Legitimate Interests Assessment (LIA) in line with updated accountability requirements.

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.

### **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 1 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're 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
- 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 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're 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
- We need to process it for reasons of substantial public interest as defined in legislation

We ensure additional safeguards are applied to this data, including access controls and minimisation, in line with strengthened legal expectations under the Data (Use and Access) Act 2025.

### **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 or tribunals

We will clearly explain the purpose of data collection at the point of collection, including any new or secondary uses, in line with enhanced transparency requirements.

### **How we store this data**

We keep personal information about you while you are visiting our school. We may also keep it beyond your visit with our school if this is necessary. Our retention policy sets out how long we keep information about volunteers and can be found on our website.

Retention periods are determined in accordance with statutory guidance, operational need, and updated data minimisation principles.

We have put in place appropriate security measures to prevent your personal information 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.

These measures include organisational and technical safeguards aligned with current UK cybersecurity expectations.

### **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 UK data protection law), we may share personal information about you with:

- Our local authority
- Government departments or agencies
- Our regulator
- Suppliers and service providers (for example filtering and monitoring)
- Financial organisations
- 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, tribunals

We ensure that all third-party processors meet updated contractual and security requirements, including clear data processing agreements where applicable.

### **Transferring data internationally**

Sometimes, for example due to apps used by the school, it is necessary to send that information outside of the UK. In such circumstances additional measures will be applied to that data for its transfer.

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.

All international transfers are carried out using recognised transfer mechanisms (such as adequacy regulations or appropriate safeguards) in line with updated UK requirements.

## Your rights

### How to access personal information that we hold about you

We keep personal information about you while you are visiting our school. We may also keep it beyond your visit with our school if this is necessary.

If you would like to make a request, please refer to our Data Protection and GDPR Policy.

We will respond to requests within statutory timeframes and provide information in a clear and accessible format.

### 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:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

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

These rights are strengthened under the Data (Use and Access) Act 2025, particularly in relation to transparency, complaint handling, and redress mechanisms.

## Complaints

We take any complaints about our collection and use of personal information very seriously.

We have internal procedures to ensure complaints are handled promptly and in line with current regulatory expectations.

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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- 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

**Contact us**

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

David Baines - [finance@elmleydrayschool.co.uk](mailto:finance@elmleydrayschool.co.uk)

For employment-related data (e.g. contractor or agency staff visitors), processing will also comply with relevant UK employment law updates effective April 2026, including fairness, transparency, and lawful processing obligations.

**Version control - Approval and review**

Version No.	Reviewed By	Approved By	Approval Date	Main Change	Review Period
1	Emily Hollis	Hayley Furnell	October 2024	Initial policy approved	Annually
1.1	Emily Hollis	Hayley Furnell	August 2025	Annual review	Annually
1.2	Emily Hollis	Hayley Furnell	1 April 2026	Updated for April 2026 Employment Rights Act reforms and Fair Work Agency oversight	Annually



Hayley Furnell, Director,  
on behalf of Elmley Dray School  
Dated: 1 April 2026  
Next review: 1 April 2027