EMMANUEL CHURCH OF ENGLAND SCHOOL
152-158 Mill Lane, West Hampstead, London NW6 1TF
Telephone: 020 7431 7984
Email: admin@emmanuel.camden.sch.uk

Emmanuel C of E School Privacy Notice
How we use visitor information

Under data protection law, individuals have a right to be informed about how the 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.

We, Emmanuel Church of England School at 152-158 Mill Lane, London, NW6 1TF are the 'Data Controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our Data Protection Officer (DPO). The responsible contact is Claire Mehegan (see contact us below)

1. The personal data we process.

The personal data that we may collect, use, store, and share (when appropriate) about those we employ or otherwise engage to work at our school includes, but is not restricted to:

- Name
- Company/Institution details
- Vehicle registration details
- Closed-circuit television Images (CCTV) images
- Disclosure and Barring Service details
- Photo ID/Image
- Relevant medical information: such as physical or mental health conditions, including any disabilities for which the organisation needs to make any reasonable adjustments to fulfil its duty of care

2. Why we process this data.

The purpose of processing this data is to help us run the school efficiently, including but not limited to:

- Fulfilling our legal obligations in relation to Keeping Children Safe in Education and Health & Safety.
- Informing our operational procedures
- Complying with the law regarding data sharing.

3. Our lawful basis for processing this data.

This section contains information about the legal basis that we are relying on when handling your information. These are defined under Data Protection legislation and for personally identifiable information are:

- Processing is necessary to comply with the legal obligations of the school.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the school (the provision of education).

When we process special category information, which is deemed to be more sensitive, the lawful basis used are:

- It is necessary to fulfill the school's obligations or your obligations
- It is necessary to protect your vital interests
    - Reasons of public interest in the area of public health.

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4. How we store this data.

Your data will be stored within the sign-in app software for six months following your final visit, then removed. It will also be kept in the school's single central record for the time you are visiting us plus six months, at which point it will be removed.

CCTV images will be stored until overridden on our main network and for 30 days in our music teaching spaces (commonly known as 'The Studio' and 'The Nest' in the Alpha Building).

5. Who we share this data with.

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Ofsted - during a school inspection
- Security organisations - to create a secure environment for all
- Our auditors, to ensure our compliance with our legal obligations
- Public bodies, such as NHS England
- Professional advisers and consultants - for us to develop our services and best provide our public service
- Police forces, courts, tribunals and security services.

6. Transferring data internationally

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.
The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.
For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.
Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

7. Data Protection Rights

Individuals have a right to make a **'subject access request'** to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we can:

- 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
- NOT provide information where it compromises the privacy of others
- 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.

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In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

Your other rights regarding your data

You may;

- Withdraw your consent to processing at any time (This only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

The School will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, although individuals are asked to preferably submit their request in written format to assist with comprehension.
Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the request

If you would like to exercise any of the rights or requests listed above, please contact Andrew Bloomer on operations@emmanuel.camden.sch.uk or 020 7431 7984

We reserve the right to verify the requester's identity by asking for photo ID. If this proves insufficient, then further ID may be required.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The school does not carry out any automated decision-making and/or profiling on visitors.

8. Data Protection Breaches

If you suspect that yours or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction, or damage, we ask that you please contact the DPO or school Operations Manager.

9. Complaints

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

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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 the school in the first instance via Andrew Bloomer on operations@emmanuel.camden.sch.uk or 020 7431 7984.

This complaint may be assessed by our independent Data Protection Officer, Claire Mehegan (claire.mehegan@london.anglican.org), with a final response provided within 30 days.

If you are unhappy with the school's final response you can refer the matter to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

10. Contact us.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, Andrew Bloomer on operations@emmanuel.camden.sch.uk or 020 7431 7984 or our independent Data Protection Officer, Claire Mehegan (contactable at claire.mehegan@london.anglican.org or on 020 3837 5149).

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11. Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.