

Visitor Privacy Notice

The New Collaborative Learning Trust vision is to create a culture of protecting privacy and personal data. Personal data is information which 'relates to and identifies a living individual'. Personal data should be adequate, relevant and limited to what is necessary.

WHO DOES THIS NOTICE APPLY TO?

This privacy notice applies to anyone not employed by the Trust visiting any of the college sites.

DATA CONTROLLER AND COLLECTION

The organisation responsible for looking after your personal data (Data Controller) is the New Collaborative Learning Trust. The Trust is committed to being transparent about how it collects, uses, stores and deletes data and to meeting its data protection obligations

WHY DO WE COLLECT AND USE STAFF INFORMATION?

We collect information about visitors on site for the purposes of security and safeguarding. We process personal data in accordance with the Keeping Children Safe in Education statutory guidance, the Education Act 2002, the Children Act 2004, General Data Protection Regulation (GDPR) and the Data Protection Act 2018. The main legal basis under GDPR for visitor information therefore falls under the following legal basis:

- **GDPR Article 6(1)c** - Processing is necessary for compliance with a legal obligation to which the controller is subject

For the purposes of Test & Trace we ask for additional information, including personal contact details. Where positive COVID-19 cases arise, and we are notified, we may process medical information, such as information about who has tested positive for COVID-19. This information will be processed lawfully, fairly, with secure measures in place. In this case the legal basis for processing fall under the following categories:

- **GDPR Article 6(1)(d)** - Processing is necessary in order to protect the vital interests of the data subject or of another natural person
- **GDPR Article 9(2)(i)** - Processing is necessary for reasons of public interest in the area of public health

HOW IS THIS INFORMATION COLLECTED?

Visitors are asked to sign in at main Reception before they access any other areas of the site. We use a system called *EntrySign* provided by Osborne Technologies to record visitation details, including a history of visits. We use touchscreen technology at Reception for visitors to enter details themselves. Some information will already be provided by the member of staff arranging the visit. This information is stored locally, and is accessed by Reception staff, staff in college responsible for safeguarding, and staff in college responsible for site security.

WHAT INFORMATION DO WE COLLECT?

The organisation collects and processes the following types of information:

- Visitor name
- Company/organisation for which the visitor is representing
- Who they are visiting
- A contact telephone/mobile number
- Email address
- Vehicle registration
- Visiting start date
- Visiting end date
- Whether a DBS check has been declared
- Visitor photo for identification purposes

The following information may also be collected for Test & Trace purposes:

- A contact telephone/mobile number
- A contact email address
- A contact address

STORING DATA (HOW LONG IS DATA HELD FOR?)

In line with best practice in the sector, government guidelines and our statutory obligations, personal data for visitors is held for the following length of time:

Visitor information	Expiry of pass + 1 year
Additional personal information used for Test & Trace	21 days

The organisation will put measures in place to ensure that data is deleted or anonymised at the end of the relevant retention periods.

WHO DO WE SHARE STAFF INFORMATION WITH?

This information is stored locally, and is accessed by Reception staff, staff in college responsible for safeguarding, and staff in college responsible for

site security. Information used for Test & Trace will be used by staff responsible for Health & Safety in college, and may be shared with other staff, students or members of the public, if it is necessary to do so. Information shared will be limited to what is necessary, and will be processed lawfully, fairly, with secure measures in place.

Otherwise, before sharing information with a third party, we will either obtain your consent or establish that the sharing is necessary (which includes ensuring that the data shared is kept to a minimum), fair and otherwise within the law.

The organisation will not transfer your data to countries outside the European Economic Area.

REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation data subjects have the right to request access to information that we hold. This is known as a subject access request. If any exemptions apply you will be notified. To make a request, please email data.protection@nclt.ac.uk.

Other rights in relation to data processing include:

- objection to processing of personal data that is likely to cause, or is causing, damage or distress
- in certain circumstances, having inaccurate personal data rectified, blocked, erased or destroyed

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, and subsequently directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

DATA PROTECTION OFFICER

If you would like to discuss, or require clarification regarding this privacy notice, please contact the NCLT Data Protection Officer. Enquiries can be forwarded to data.protection@nclt.ac.uk or by calling 01977 702139.