

## NCLT 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 our 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 visitor 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, UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The main legal basis under the UK GDPR for visitor information therefore falls under the following legal basis:

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

We do not undertake any automated decision making.

### **Categories of visitor information**

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

### **Collecting visitor information**

#### **Colleges**

Visitors are asked to sign in at main Reception before they access any other areas of the site. We use a system called *Entry Sign* 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.

#### **Wingfield**

Visitors are asked to sign in at main Reception before they access any other areas of the site. We use a system called *Sign In App* 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 in cloud based storage, and is accessed by Reception staff, HR staff, staff in college responsible for safeguarding, and staff in college responsible for IT processing.

**Storing visitor data**

We will store student data for no longer than necessary, in accordance with data protection legislation and best practice. In some circumstances data could be held longer if this is required for compliance with a legal obligation to which the data controller is subject. Visitor Data will be stored electronically within EntrySign and Sign In App systems and held centrally at Trust Headquarters or on site.

Retention of the data includes the following

Visitor information Expiry of pass + 1 year

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 visitor 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 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](mailto: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, we request that you raise your concern with us in the first instance. Alternatively, you can contact 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](mailto:data.protection@nclt.ac.uk) or by calling 01977 702139.