

# Inspire - Enable - Achieve



## The Vale Federation Privacy Notice - General

Date policy last reviewed: September 2024  
Date policy to be reviewed: September 2025

Signed:

Principal

Date 12th November 2024

Chair of Governors

Date 12th November 2024

# **The Vale Federation**

## **Data Privacy Notice**

**If you would like to discuss anything in this privacy notice, please contact:**

**Data Protection Officer: Data Protection Education**

**Deputy DPO: Business Director & Finance & IT  
Manager**

**Telephone: 0800 086 2018**

**Email: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)**

## **Contents:**

Purpose of this policy	3
The categories of school information that we process	3
Why we collect and use general and visitor information	3
Collecting visitor information	4
Storing general & visitor information	4
Who we share visitor information with	5
Why we share school visitor information	5
Requesting access to your personal data	6
Withdrawal of consent and the right to lodge a complaint	6
Last updated	7
Contact	7
Data collection requirements	7

# Privacy Notice – General & Visitors – Purpose of this Policy

The Vale Federation (includes Booker Park School and Stocklake Park School) is a data controller and this document describes the data that is collected and how it is processed to data subjects other than pupils and workforce. As data controller, we are responsible for deciding what data is collected and how it is processed.

Under the Data Protection Act 2018 and the GDPR, we must abide by the principle of transparency and the right of data subjects to be informed about how their data is processed.

This document provides such information. It will be updated occasionally, and updates will be communicated accordingly.

It is your duty to inform us of changes about you and your data.

## Privacy Notice – General & Visitors (How we use information)

### The categories of school information that we process

These include:

- personal information (such as name, contact number)
- medical information (such as additional supportive measures)
- accident information (such as should an accident occur whilst on the facility/premises)

This list is not exhaustive, to access the current list of categories of information we process please see request a link to our Data Asset Register from [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

### Why we collect and use general and visitor information

We use general and visitor data to:

- a) to be aware of all persons on site at any one time
- b) to support with any emergency evacuation
- c) to ensure the safety and security of all pupils and staff
- d) to ensure the safety and security of all visitors

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the legal basis / bases we rely on for processing personal information for general purposes are:

- a) Consent: the individual has given valid consent for you to process their personal data for a specific purpose.
- b) Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

- c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

- for the purposes of being aware of all persons on site at any one time in accordance with the legal basis of a, c and d above
- for the purposes of supporting with any emergency evacuation in accordance with the legal basis of c above
- for the purposes of ensuring the safety and security of all pupils and staff in accordance with the legal basis of c above
- for the purposes of ensuring the safety and security of all visitors in accordance with the legal basis of c and d above

In addition, concerning any special category data ([UK GDPR - Article 9](#)):

- DPIA (Data Protection Impact Assessment) are completed for all special category data held
- Special Category Data is supplied voluntarily, either via entry into the Entry Sign system or by verbal advisement by the data subject themselves
- Any special data will always meet one of the following criteria:
  - a) Explicit consent
  - c) Vital interests
  - d) Health or social care (with a basis in law)

## Collecting visitor information

We collect personal information via:

- Entry Sign system
- Verbal from the data subject, then added to the Entry Sign system
- Entry into Accident Reporting system

Visitor data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

## Storing general & visitor information

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit <https://www.thevalefederation.com/policies-2/gdpr/>.

Further details of our Data Retention Policy can be requested from [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

Data is currently held as follows:

<b>Data</b>	<b>Where</b>	<b>Security</b>	<b>DPIA Completed (if applicable)</b>	<b>Retention Period</b>
Accident Reports	Smartlog Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Personal, characteristics	Entry Sign Ltd	High, Encrypted	YES	Contact dpo@thevalefederation.com

## Who we share visitor information with

We routinely share this information with:

- The Vale Federation (the organisation and governing board responsible for the school(s))
- Health & Safety Executive (RIDDOR accident submissions)

## Why we share school visitor information

We do not share information about our visitors with anyone without consent unless the law and our policies allow us to do so.

<b>Data Type</b>	<b>Legal Basis for Sharing</b>	<b>Shared With</b>	<b>Method of Transfer</b>
Personal, characteristics	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). Vital interests: the processing is necessary to protect someone's life.	The Vale Federation	Electronic, Secure Internal Network, Encrypted, Restricted Access
Accident at Work Reporting/RIDDOR	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).	HSE (Health & Safety Executive)	Electronic, Encrypted, Restricted Access

## Requesting access to your personal data

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

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 or directly to the Information Commissioner's Office at [raise a concern with ICO](#)

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

## Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 25 September 2024

## **Contact**

If you would like to discuss anything in this privacy notice, please contact: [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

## **Data collection requirements**

To find out more about the data collection requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To contact The Vale Federation about any elements stated within this Privacy Notice – General and Visitor Policy, please email [dpo@thevalefederation.com](mailto:dpo@thevalefederation.com)

To be reviewed annually or any changes or updates to the legislation by The Business Director.