



4 - 18 yrs Co-educational Independent Day School

Privacy Notice for Visitors

Who are we?

Arnold Lodge School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

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 notice is for people visiting Arnold Lodge School, including outside speakers, student teachers on their placements, staff from other schools or agencies with whom we work, contractors, parent helpers and volunteers. It explains how and why we collect your personal data what we do with that data.

Arnold Lodge School is the 'data controller' for the purposes of the Data Protection Act 2018. This means we are responsible for how personal information is processed and for what purposes. Arnold Lodge School collects a lot of data and information about visitors so that we can run effectively as a school. This privacy notice explains how and why we collect this data, what we do with it and what rights parents and pupils have.

What is personal data?

Personal information relates to a living individual who can be identified from that information.

Your personal data is information that identifies you as an individual. The school will collect, hold and process personal data about visitors. The personal data we process may include:

- Name, date of birth, gender, marital status;
- Identity information including copies of Passports and/or Driving Licences
- Evidence if applicants hold an Enhanced Disclosure and Barring Service certificate
- Contact details (address, telephone numbers, email address, the company you work for or the university you are attending if appropriate);
- Contact details of next of kin;
- Car registration numbers;
- Details of payments made to contractors.
- Photographs

The school may also process information about visitors which is classified as 'special category' data, which requires additional protections. For example, we may collect the following special category data:

- Information relating to their health (whether physical or mental) or disability information;
- Information about religion or beliefs;
- Trade Union affiliation where applicable;
- Details of criminal convictions;

- Photographs and CCTV images

These lists are not exhaustive.

How and why we collect personal data?

The school may acquire personal data in a number of ways. Much of it will be provided by you yourself. For example, you will provide the school with personal data about yourself when you visit the school. When you enter into a contract of employment you also consent to the school processing data about you as necessary for the proper administration of the employment relationship, both during and after your employment.

Personal data will also be created internally by the school subsequently during the employment. For example, when you share personal information during the course of your employment.

It may also be acquired from outside of the school, i.e. from other schools, from public authorities, in connection with references, from the Disclosure and Barring Service or from providers of our occupational health service, etc.

We collect this information primarily to ensure that we provide a safe and secure work/teaching environment, to properly manage the employment relationship, to provide training and support, to protect and promote the school's interests and objectives, to facilitate our administration, to ensure that all relevant legal obligations of the school are complied with and for other related legitimate purposes.

Some examples of why we might routinely need to use your personal data are:

- Holding contact details in order to let you know if the school is closed during poor weather conditions;
- Keeping information about physical or mental health conditions in order to monitor sick leave and take decisions regarding fitness for work;
- Keeping information about ethnicity and religion in accordance with the school's equal opportunities policy in order to monitor compliance with equal opportunities legislation;
- Using CCTV recordings for the purposes of crime prevention and investigation and also in connection with our obligation to safeguard the welfare of students, staff and visitors to the site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with data protection legislation;
- Using photographs and video recordings of staff for marketing and promotion purposes, including in school publications, in social media and on the website. The school may also allow external publication of media where appropriate (for example, in a local newspaper). The school may also make recordings for teaching purposes, for example, recording a drama lesson to provide feedback to students;
- Publishing of names and contact details of staff in school publications and on the school's internal and external websites.
- Using an Internet filtering service to monitor internet usage and keywords and phrases on all school machines.
- Keeping a record of staff members who are currently on the site.

Arnold Lodge School may also use Personal Data pertaining to staff for other purposes where data protection legislation allows and where providing an explanation would not be appropriate. For

example, this includes sharing personal data about staff with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of offenders.

What is the lawful basis for using this information?

Under the current Data Protection legislation we collect and use most staff data to carry out our legal responsibilities as your employer.

In other instances we may ask for consent to process your data (i.e. when its use is optional). On those occasions consent can be withdrawn at any time. We will make this clear when we ask for consent.

Who do we share data with?

We do not share any personal data pertaining to staff with any other organisation without your permission, except where the law requires it or when we have a good reason to do so. Here are some examples of when we may need to share data:

- With government departments and agencies where we have a statutory obligation to provide information (i.e. to HMRC);
- With the Disclosure and Barring Service where we need to make a criminal records check;
- On occasion with the police and other law enforcement agencies;
- With those inspecting the school (i.e. Independent Schools Inspectorate);
- In accordance with our legal obligations, with local authorities and the Department for Education, for example, where we have any safeguarding concerns;
- With the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime and the prosecution of crimes;
- We may engage contractors to provide services for the school from time to time, i.e. to facilitate the effective administration of our systems, and this may require them to have access to personal data. If so, we will ensure that they are contractually bound to respect confidentiality and comply with all relevant data protection requirements;
- With our Board of Directors
- If you are participating in a school trip or an external event, we may need to share some of your information (i.e. contact details in case of emergency) with the event organiser/host organisation or the tour operator or accommodation provider;

This list is not exhaustive.

How long do we keep this information?

Arnold Lodge School has a Records Management and Retention Policy which sets out how long we will keep your personal information for. We only retain your information for as long as we need to. The retention period depends on the type of information held. In exceptional circumstances we may keep your information for a longer time than usual or share it more widely than we would normally.

What decisions can you make about your information?

- If information held about you is incorrect you can ask us to correct it. If you would like us to change or update the information we hold about you please speak to the Data Protection

Officer.

- You have the right to prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- You can object to any decision that significantly affects you from being taken solely by a computer or other automated process.
- You have the right to request access to the information we hold about you. To make a request for any of your personal information, please contact the Data Protection Officer by emailing the DPO@arnoldlodge.com

Transferring data internationally

Transfers of personal data out of the UK to 'third countries' or international organisations are restricted by the UK GDPR (as per the UK Data Protection Act 2018 and related regulations). The UK is an adequate country for EU GDPR purposes under a European Commission adequacy decision issued under the EU GDPR in June 2021.

Contact Us

Please email DPO@arnoldlodge.com in respect of all matters relating to data protection issues, and to make referrals, where necessary, to the Data Protection Officer.

Our DPO is the School DPO Service and is contactable via schooldpo@warwickshire.gov.uk or alternatively you may write to;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

Complaints

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

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.

To make a complaint, please contact our DPO at DPO@arnoldlodge.com.

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

- Report a concern online via their website www.ico.org.uk/global/contact-us/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF