



Visitor Privacy Notice

Responsibility	Delegated to Head Teacher (Finance and Resources)	
Status	Statutory	
Ratification date	25 September 2025	
Review cycle / date	1	Autumn 1 2026
Reference	Ref: 051	

Privacy Notice

How we use the School Workforce's information

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1. 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**.

The Richmond upon Thames School is 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 David Coy (see contact us below)

2. The personal data we process.

We process data relating to those visiting our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:

- Name
 - Company/Institution details
 - Vehicle registration details
 - Closed-circuit television Images (CCTV) images
 - Disclosure and Barring Service details
 - Photo ID/Image
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- Data generated through the school's telephony and communications platform (Evonnex Connect), such as call logs, voicemail, and, where enabled, call recordings, which may include visitor interactions with the school office for safeguarding, security, or compliance purposes
- 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

3. Why we collect and process this data.

The purpose of collecting and 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
- Facilitating secure and effective communication with visitors, including through the school's telephony and communications platform (Evonnex Connect)
- Supporting safeguarding, site security, and dispute resolution through proportionate use of call logging and, where enabled, call recordings

4. Our lawful basis for using 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.

5. How we store this data

We collect, store and process data for each visitor to the school. The information is contained in secure electronic systems and/or physical visitor records, and is only used for purposes directly relevant to your visit.

Where call recordings are made through our telephony and communications platform (Evonnex Connect), these are stored securely within the UK across three data centres for a maximum of six months before being

automatically deleted. Access to recordings is strictly limited to authorised staff and only for safeguarding, site security, or compliance purposes.

We retain visitor information in line with our retention policy, which is available on request from the **School Data Protection Lead: Ms Saund** via SLT@rts.richmond.sch.uk

6. Who we share 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
- Our telephony and communications service provider (Evonnex Connect), for the purpose of managing visitor communications in line with our safeguarding, site security, and compliance requirements.

7. Transferring data internationally

Our telephony and communications platform (Evonnex Connect) stores data securely within the UK across three data centres. Visitor data processed through this system does not leave the UK.

In all cases, we apply strict technical and organisational safeguards to ensure that visitor information remains protected to UK data protection standards.

8. 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.

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 **the Head Teacher's PA: Barbara Munro:**

- Pa@rts.richmond.sch.uk
- **0208 891 2985**
- **The Richmond uponThames School, Egerton Road. Twickenham Middlesex TW2 7SL**

We reserve the 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.

9. Data Protection Breaches

If you suspect that your 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 School Data Protection Lead and the Head Teacher** via SLT@rts.richmond.sch.uk and advise us without undue delay.

10. 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 data protection officer, David Coy (contactable on david.coy@london.anglican.org, 020 3837 5145).

Alternatively, you can refer a complaint 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, Priti Saund, Director of Finance at the Richmond upon Thames School** or **our independent Data Protection Officer, David Coy (contactable on david.coy@london.anglican.org, 02038375145).**

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.