

PRIVACY NOTICE FOR VISITORS & **VOLUNTEERS POLICY** September 2025

Policy Review

This policy will be reviewed in full by the Directors on an annual basis unless circumstances require policy update in the interim.

The policy was last reviewed and agreed by the Directors on 01.09.2025.

It is due for review on 01.09.2026 (up to 12 months from the above date).

Signature (CEO): Date: 01.09.2025

Signature (COO): Date: 01.09.2025

Version Control

Version	Date	Changes
V1	04.09.2023	Original document
V2	01.09.2024	Terminology and layout update
V3	01.09.2025	Ring Smart Doorbell and Reception Camera System Layout update

Privacy Notice for Provision Visitors and Volunteers

This notice is for all contractors and visitors who work at and visit Edit Education. It explains the purposes for which we hold information about you. All data is held and processed in line with Edit Education's Data Protection Policy, which can be viewed on request. What data does Edit Education collect and why?

We maintain a signing in system, which includes employees (visiting site), visitors and contractors. The system will collect and keep your personal data such as your name and company name. This information is collected for health, safety, and security purposes.

CCTV System

The Closed-Circuit Television (CCTV) system is used by our landlord and monitors the entrance to the building. Edit Education will only request access to the CCTV in the event of criminal activity impacting on Edit Education. It is installed to provide a safe and secure environment. In the event of any criminal activity the system will be used fairly, within regulatory guidelines and law, with the personal privacy of individuals using the building and the objective of recording incidents for safety and security in mind.

Ring Smart Doorbell and Reception Camera System

Edit Education have a Ring smart doorbell located externally next to the front door for students, parents, visitors and volunteers to use. We do not have any external windows so the ring doorbell allows us to see personal at the door before letting them into the premises. We also have a connected Ring camera located within our enclosed reception area. This camera is intended promote the safeguarding of staff, students, parents and visitors during procedures such as visitors signing in and students handing over their phone as they enter the provision. Both the smart doorbell and reception camera have the capability to record sound.

Edit Education have conducted a <u>Data Protection Impact Assessment (DPIA)</u> that fully addresses our need to use a smart doorbell and reception camera, the lawful basis for their use and explores the impacts on the rights and freedoms of individuals whose personal data is captured.

We appropriately position our smart doorbell and reception camera in such a way that the camera does not inadvertently record neighbouring entrances or private property and that are not the intended subject of surveillance. Edit Education ensure that any footage that we record, is kept securely and is appropriately governed in terms of retention, security, disclosure and access.

Provision staff ensure that the Ring doorbell app we use is secure and kept up to date with the latest patches by checking communications from the manufacturer or vendor. There is appropriate signage to inform individuals that surveillance is in use. We limit any continuous recording, and the possible intrusion of others, by only having the camera activate when the doorbell senses motion. We comply with the Surveillance Camera code of practice where required and further information can be found rein our CCTV policy.

Accidents and Incidents Reporting

In the event of an accident or incident, Edit Education will request the visitor/contractor to complete an Incident Report Form. This will include personal data from the injured party or

person suffering from ill health, such as name, address, date of birth and details of the incident to include any relevant medical history. The data is collected as Edit Education has a legal duty to document workplace incidents/accidents and to report certain types of accidents, injuries and dangerous occurrences arising out of its work activity to the relevant enforcing authority.

Incidents and accidents will be investigated to establish what lessons can be learned to prevent such incidents/accidents re-occurring including introduction of additional safeguards, procedures, information instructions and training, or any combination of these. Monitoring is undertaken but on an anonymised basis. The information is also retained in the event of any claims for damages.

Legal Basis for processing:

The legal basis of processing is set out as follows:

Area	Legal basis	Information
Visitor signing in/out	Legitimate	To ensure that there is a safe environment for
system	Interests	every person visiting Edit Education's premises.
CCTV / smart		
doorbell		
Accidents and		
Incidents reporting		

Disclosures

Edit Education would only disclose information from the Visitor signing in/out system or CCTV/smart doorbell, which is required to detect or prevent crime. This is usually on receipt of a Police issued personal data request form, required under Police Investigations Section 29(3) of DPA 1998. There are instances such as prevention of threat to life or serious injuries, where personal information may be provided without a signed police DPA form.

Your rights as a Data Subject

Under the Regulation, Data Subjects have 8 rights, as listed below. Edit Education will ensure procedures are in place to be able to respond in a timely manner to any request from a Data Subject to exercise one of their rights. The eight rights are:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights in relation to automated decision making and profiling

Subject Access Requests

If you wish to see copies of the information held on you by Edit Education, you may submit a Subject Access Request. Such requests must be made in writing and marked for the attention of Jamie Bentley.

Edit Education is registered as a Data Controller with the Information Commissioner. You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see https://ico.org.uk