THE PORTSMOUTH GRAMMAR SCHOOL

# The PGS Privacy Notice for Visitors

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## 1. Purpose of this Privacy Notice

This privacy notice explains how The Portsmouth Grammar School collects, uses, stores, and shares personal information about visitors, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. What Information We Collect

When you visit our school, we may collect and process the following information, for example:

1. Personal details (for example, name, date of birth, national insurance number)
2. Contact details (for example, address, telephone number, email address)
3. Professional details (for example the organisation you work for)
4. Records of visits to school (for example, time and date, the person you visited)
5. Photographs of you or images on CCTV
6. Records of work that you do in conjunction with our staff or students
7. Notes from meetings you may have (for example if you attend for an interview)

## 3. Why We Collect This Information

We collect this information to:

1. Maintain the safety and security of pupils, staff, visitors, and the premises
2. Meet our safeguarding obligations
3. Monitor and manage visitor access
4. Comply with health and safety regulations
5. Maintain accurate records of visitors in case of emergencies or incidents

## 4. Our Lawful Basis for Processing

The lawful bases under the UK GDPR for processing visitor personal information include:

1. Legal obligation – to comply with health and safety or safeguarding laws
   For example: if we are required to report an accident or injury you suffer
2. Legitimate interests – to ensure security and efficient school operations
   For example: records of an interview for employment, CCTV
3. Public task – as part of the school's official functions and responsibilities
   For example: Recording the details of your visit to school
4. Consent – you agree to use of your data in a particular way
   For example: on a visit to the school, you sign up to a mailing list for future events

If you do not wish to give such personal data (for example: CCTV footage, your name, contact details) then you are unable to visit the school. Due to safeguarding reasons we must be able to have this identifiable personal data to comply with our legal obligations.

We will ensure that for any personal data processing activity we undertake, there is at least one lawful basis permitting this.

## 5. How We Store Your Information

Visitor data is stored securely in either electronic or paper format and is only accessible to authorised staff. CCTV footage is stored for a limited period unless required for an ongoing investigation.

## 6. Who We Share Your Information With

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent. Examples of people we may share personal data with are:

1. Local Authority
2. The Department for Education
3. Healthcare, social and welfare organisations
4. Police forces and Courts
5. Voluntary and charitable organisations
6. Our suppliers and service providers

Where we share your personal data with someone who is a "supplier" (a party from whom the School purchases goods, services or similar, such as the provider of our visitor digital check-in system ) or service provider we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

We would not transfer personal data to countries or recipients outside the UK, unless there is a clear and legitimate justification for doing so (for example, a parent who is living abroad).

## 7. How Long We Keep Your Data

Visitor information is retained in accordance with our data retention schedule. Typically, visitor logs are kept for 6 years unless there is a safeguarding or legal reason to retain it for longer. If you want more details of the retention of your information, please ask us or contact the Data Protection Lead listed at the end of this notice.

## 8. Your Rights

Under data protection law, you have the right to:

1. Access the information we hold about you
2. Request correction or deletion of your data
3. Object to or restrict our use of your data in some circumstances
4. Where consent is given, it is your right to withdraw consent where possible
5. Complain to the Information Commissioner's Office (ICO)

## 9. Related policies

See also where relevant the PGS Privacy Policies for the PGS website and The PGS Alumni website (PGS Connect)

## 10. Contact and Complaints

Data Protection Lead: Mr John Read (Bursar)
Email address: j.read@pgs.org.uk
Contact number: 023 9236 4250
Contact address: The Portsmouth Grammar School, High Street, Portsmouth, Hampshire, PO1 2LN

Data Protection Officer: GDPR Sentry Limited
Email address: support@gdprsentry.com
Contact number: 0113 804 2035
Contact address: Unit 434 Birch Park, Thorp Arch Trading Estate, Wetherby, LS23 7FG

If you have any questions about how we handle your data or wish to exercise your rights, please contact the Data Protection Lead or the Data Protection Officer.

Alternatively, you can contact the Information Commissioner's Office (ICO) at: https://ico.org.uk or call 0303 123 1113.

## 11. Allocation of Tasks and Version Control

### Allocation of Tasks

| Task | Allocated to | When / frequency of review |
|---|---|---|
| Keeping the policy up to date and compliant with the law and best practice | Bursar | As required, and at least annually |
| Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness | Director of Information Services | As required, and at least termly |
| Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR | Data Manager | As required, and at least termly |
| Receiving/reviewing input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy | School Business Meeting | As required, and at least annually |
| Formal annual review | SMT | Annually |

### Version Control

| | |
|---|---|
| **Date Approved** | 29th June 2026 (SMT) |
| **Date Reviewed** | 22nd June 2026 (School Business Meeting) |
| **Next Review Date** | Summer Term 2027 |
| **Policy author (SMT)** | Bursar / Head of ICT Services |
| **Status** | External |
| **Report** | ICT and Data Report |

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