Privacy Notice for Visitors – How we use your information

Who are we?

Central England Academy Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Central England Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration reference: ZA540893

You can contact the Central England Academy Trust as the Data Controller in writing at:
Oak Wood Schools, Morris Drive, Nuneaton, CV11 4QH or datacontroller@centralengland.co.uk.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about visitors to our schools and Trust premises.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about visitors?

The categories of visitor information that we collect, hold and share include:

- The information you have provided on our Inventry signing in system including:
- Full name
- Car registration
- Contact details and contact preferences
- Where appropriate to the visitor's role and activities, confirmation of relevant identity, safeguarding and DBS checks
- Employer details
- Photographs
- Information obtained through proportionate online searches, such as for prospective visiting speakers, where appropriate, to assess safeguarding concerns and potential risks associated with extremism or radicalisation, in accordance with the Trust's responsibilities under the Prevent duty. These searches may include relevant information from publicly accessible websites, publications and social media profiles.

- Photographs and CCTV images captured in school/on site
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, hold and share the following "special categories" of more sensitive personal information:.

- Information about your health and any medical conditions (where required for adjustments)
- Information about disability and access requirements

Criminal Offence Data

We may collect and process information relating to criminal convictions, offences, allegations or relevant safeguarding and barring information where necessary to establish whether an individual is suitable to undertake particular activities within our schools.

- This may include confirmation of Disclosure and Barring Service (DBS) checks, relevant safeguarding information and information relating to restrictions on working with children or vulnerable individuals.
- Criminal offence data is subject to additional protection under Article 10 of the UK GDPR and the Data Protection Act 2018. It is not classified as special category personal data under Article 9.
- We will only process this information where we have an appropriate lawful basis under Article 6 of the UK GDPR and where the processing is authorised under Article 10 and the relevant provisions of the Data Protection Act 2018, including an applicable condition under Schedule 1.
- Access to this information will be restricted to authorised individuals and it will only be retained for as long as necessary in accordance with our retention arrangements.

How is your personal information collected?

We collect personal information about visitors when you sign into our school premises. This information is stored within our electronic signing in system/visitor book.

We may also collect information ahead of your visit to our schools, which we collect directly from you or the person arranging your visit. e.g., the organisation you work for, the person arranging the visit, relevant safeguarding bodies and publicly available sources for prospective visiting speakers, where applicable. Only relevant publicly available information is considered with the source and context recorded. Searches may reveal religion or political opinions, which will require seperate Article 9 assessment.

For what purposes do we use visitors' personal information?

We will use your personal information to:

- Keep records
- Identify you and keep you safe while on the school site
- Keep pupils and staff safe
- Provide appropriate access arrangements for visitors that require them
- Undertake incident/accident investigation and any required statutory reporting
- Maintain accurate records of visits to the school
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely
- Comply with legal or regulatory requirements

- Establish due diligence checks under Prevent
- Optional promotional photographs with consent

Collecting visitor information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. We will explain which information is necessary for access, safeguarding or legal compliance, and which is optional. Where we seek consent for promotional photographs, declining consent will not affect the visit.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

1) To comply with the law
We collect and use general purpose visitor information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

2) To protect someone's vital interests
We are able to process personal information when there is an emergency and/or where a person's life is in danger. Vital interests applies where processing is necessary to protect someone's life, particularly where the individual cannot provide consent; it is not a general basis for routine emergency contact collection.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'
In certain circumstances, we may ask for your consent to collect and use personal information for purposes that are not necessary for your visit to our premises. This may include taking and using photographs or video recordings for school or Trust newsletters, websites, social media or other promotional materials. Where we rely on consent, we will explain how your information will be used and, where applicable, published or shared. Providing consent is voluntary, and you may withdraw it at any time.

Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn. Where information has already been published or shared, it may not always be possible to remove copies held by third parties.

Details of the information processed on this basis are set out in Table 3.

4) To perform a public task
As an Academy Trust, we are required to carry out certain functions in the public interest and in the exercise of official authority vested in us as an educational establishment. This includes activities such as safeguarding, statutory reporting, site management, and providing information to regulatory bodies and government departments.

In some cases, we process visitor information to support these functions, meeting our obligations under education and equality legislation.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract
In certain circumstances, personal information may be processed where it is necessary to fulfil a contract with an individual or to take steps at their request before entering into a contract.

Central England Academy Trust does not currently rely on this lawful basis for processing personal information collected through its routine visitor management arrangements.

6) We have a legitimate interest
In certain circumstances, we may process personal information where it is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not overridden by your rights and freedoms.

The Trust has legitimate interests in ensuring the security of its systems and premises, preventing fraud, protecting Trust assets and information, and safeguarding pupils, staff and visitors.

Where we rely on legitimate interests as our lawful basis for processing, we will ensure that the processing is necessary, proportionate and balanced against your individual rights.

Details of the type of processing that we may undertake on this basis are set out in Table 6.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
3) Processing relates to personal data which is manifestly made public by the data subject
4) Necessary for establishing, exercising or defending legal claims
5) Necessary for reasons of substantial public interest
6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

Who might we share your information with?

We may share visitor information with:

- Members of our staff who are meeting you in our schools.
- Our Local Authorities to meet our legal obligations to share certain information, such as safeguarding concerns
- Suppliers and service providers to enable them to provide the service we have contracted them for
- Professional advisers and consultants

- Emergency services
- Police/Safeguarding agencies
- Insurers

Appropriate security measures have been put in place to prevent personal information being accidentally lost, used or accessed in an unauthorised way.

Procedures are also in place to deal with suspected data security breaches and you will be notified of a suspected breach where we have a legal obligation to do so.

What do we do with your information?

All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

How long do we keep your information for?

We retain visitor information only for as long as necessary for the relevant purpose. In retaining personal information, Central England Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information. Retention periods may differ for visitor logs, CCTV, safeguarding records, accident reports. A copy of those schedules can be located on the Trust website.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, visitors have the right to request access to the information about them that we hold. To make a request for your personal information or if you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact:

Our data protection lead at the Trust:

- Chief Operating Officer, Central England Academy Trust, datacontroller@centralengland.co.uk

or the **School Data Protection Officer (DPO) at Warwickshire Legal S**ervices via email at schooldpo@warwickshire.gov.uk or alternatively;

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

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations; and
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a concern about how your personal data has been handled, please contact our Trust Data Protection Lead (DPL) or our Data Protection Officer (DPO). This gives us the opportunity to investigate and resolve the matter as quickly as possible.

There is no set format for making a data protection complaint. However, submitting your complaint in writing using our data protection complaints form may help us to respond more promptly. Please direct your complaint to:

- Trust Data Protection Lead (DPL) email: datacontroller@centralengland.co.uk
- School/Trust Data Protection Officer (DPO): schooldpo@warwickshire.gov.uk

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:
- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights. For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed annually.

Data Tables:

The tables below set out the types of processing carried out by the school/Academy Trust and lawful reasons for doing so.
Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	with whom we share this information	Lawful reason for sharing
Information necessary to verify the identity, suitability and safeguarding clearance of visitors undertaking activities for which statutory checks are required. This may include confirmation of appropriate DBS and barred list checks, where applicable	Education Act 2002, section 175; Safeguarding Vulnerable Groups Act 2006; relevant regulations governing the particular role or activity. Keeping Children Safe in Education 2026 (statutory guidance).	Not normally applicable to basic identity and DBS status confirmation.	Authorised school and Trust staff; relevant safeguarding authorities or regulators where legally required	Legal Obligation, where processing is necessary to meet an identifiable statutory requirement
Personal information relating to accidents, injuries and dangerous occurrences involving visitors, where recording or reporting is necessary to comply with statutory health and safety requirements.	Health and Safety at Work etc. Act 1974; Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), where applicable; Social Security (Claims and Payments) Regulations 1979, where applicable.	Not normally applicable. RIDDOR imposes specific duties, but not every incident or accident is subject to RIDDOR reporting.	Authorised school and Trust staff; HSE or other enforcing authorities where required; insurers and professional advisers where necessary and lawfully permitted.	Legal Obligation, for statutory recording and reporting requirements Other disclosures will be assessed against the applicable lawful basis.
Publicly available information obtained through proportionate online searches and due diligence checks of prospective visiting speakers to assess suitability and identify potential safeguarding or Prevent-related risks.	Counter-Terrorism and Security Act 2015, section 26; Prevent Duty Guidance for England and Wales (2023); Keeping Children Safe in Education 2026	If online searches reveal religion, political opinion or propaganda this special category information is processed, using the relevant Article 9 condition and any applicable Data	Authorised school staff, including the Designated Safeguarding Lead and Headteacher; Trust safeguarding leads and relevant statutory agencies where necessary.	Legal Obligation – Article 6(1)(c), where processing is necessary to comply with the Trust's statutory Prevent duty.

		Protection Act 2018 Schedule 1 conditions must be identified.		

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**with whom we share this information**	**Lawful reason for sharing**
Emergency medical information (e.g. allergies, medical conditions disclosed during visit)		Necessary to protect vital interests where the data subject is incapable of giving consent necessary to protect life, Legal Obligation	Emergency services (paramedics), first aid trained staff	Vital Interests
Emergency contact details (where provided)		Not normally applicable	Emergency services (if required)	Vital Interests

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - Please note, you have the right to withdraw your consent for us to process your data in this way at any time.

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**with whom we share this information**	**Lawful reason for sharing**
Photographs and video recordings of visitors used for school or Trust newsletters, websites, social media and promotional publications, where consent is obtained.	UK GDPR Article 6(1)(a); Data Protection Act 2018	Not normally applicable	Authorised school/Trust staff, approved communications providers and members of the public where published	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. You have the right to object or restrict processing that is carried out for the purposes of Public Task – However, please note that this is not an absolute right and would only apply in certain circumstances.

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**with whom we share this information**	**Lawful reason for sharing**
Visitor identification and access records, including name, organisation, purpose of visit, photograph where used for identification, and arrival/departure times, to manage access to school premises and support safeguarding, security and emergency arrangements.	Education Act 2002, section 175; Keeping Children Safe in Education 2026 (statutory guidance); Health and Safety at Work etc. Act 1974	Not normally applicable	Authorised school and Trust staff; emergency services or relevant authorities where necessary and lawfully permitted; visitor management system provider acting on behalf of the Trust.	Public Task, where processing is necessary to support the Trust's public educational and safeguarding functions.
Observations relating to safeguarding and/or unsafe practice	Keeping Children Safe in Education (KCSiE) Health & Safety at Work Act 1974	Not normally applicable. Records of safeguarding concerns or unsafe practices do not ordinarily involve special category personal data. Where such information is included, an appropriate Article 9 condition will be identified. Where criminal offence data is involved, Article 10 UK GDPR and the relevant	Ofsted, Local Authority, Employer	Public Task

		provisions of the Data Protection Act 2018 will apply.		
Visitor management system records, including dates and times of arrival and departure, visitor identification details and relevant system audit logs, used to monitor building occupancy and usage, support site security, verify attendance and assist with safeguarding and emergency arrangements.	Education Act 2002, section 175; Health and Safety at Work etc. Act 1974; Keeping Children Safe in Education 2026 (statutory guidance).	Not normally applicable	Authorised school and Trust staff; visitor management system providers acting on behalf of the Trust; emergency services or relevant authorities where necessary and lawfully permitted.	Public Task, where processing is necessary to support the Trust's public educational, safeguarding and site management functions.
Information relating to visitors' use of school ICT systems, including network access logs, device identifiers and records of websites accessed or blocked, where available. This information may be used to investigate inappropriate, unsafe or unauthorised online activity and maintain the security of school systems.	Education Act 2002, section 175; Keeping Children Safe in Education 2026 (statutory guidance); UK GDPR Article 32 (security of processing).	Not normally applicable. Where investigations necessarily involve special category information, an appropriate Article 9 condition will be identified	Authorised school and Trust staff, including IT and safeguarding leads where appropriate; approved IT service providers; relevant statutory authorities where necessary and lawfully permitted.	Public Task, where processing is necessary to support the Trust's safeguarding responsibilities and maintain secure ICT systems
Vehicle registration	Health and Safety at Work etc. Act 1974; Management of	n/a	Authorised school and	Public Task, where processing

details collected through the visitor management system, used where necessary to identify and contact visitors whose vehicles are parked unsafely, obstruct access or emergency routes, or present a potential health and safety risk on school premises.	Health and Safety at Work Regulations 1999; Education Act 2002, section 175, where safeguarding responsibilities are relevant.		Trust staff responsible for site safety, security and premises management; emergency services where necessary.	is necessary to support the safe management of school premises and protect pupils, staff and visitors..
CCTV images of individuals on school premises, which may be reviewed where an incident has been reported or a concern raised, to establish the circumstances, support investigations and protect the safety and security of pupils, staff, visitors and school property.	Education Act 2002, section 175, where safeguarding is relevant; Health and Safety at Work etc. Act 1974; UK GDPR and Data Protection Act 2018; ICO guidance on video surveillance.	Not normally applicable. CCTV images are not automatically special category data. Where footage is processed in a way that involves special category data, an appropriate Article 9 condition will be identified.	Authorised school and Trust staff; police, emergency services, safeguarding agencies, insurers or legal advisers where necessary and lawfully permitted.	Public Task, where processing is necessary to support the Trust's safeguarding, safety and security responsibilities..

Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**with whom we share this information**	**Lawful reason for sharing**
Not applicable – CEAT does not currently process routine visitor information	N/A	N/A	N/A	N/A

under this lawful basis.				

Table 6 - Personal information we process because we have a legitimate interest. Please note that the right to object will apply to *some* of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?*'

Information Type	**Relevant legislation**	**Special Category– additional lawful reason**	**with whom we share this information**	**Lawful reason for sharing**
Technical system audit logs generated by the visitor management system, including user access records, login activity, system changes and administrative actions, where these identify an individual. Used to maintain system security, investigate suspected unauthorised access, identify technical issues and support system administration.	UK GDPR Article 5(1)(f) (integrity and confidentiality) and Article 32 (security of processing); Data Protection Act 2018.	Not normally applicable	Authorised Trust and school staff responsible for system administration, IT security and data protection; the visitor management system provider and authorised IT support providers where necessary.	Legitimate Interests, where applicable, to maintain the security, integrity and effective operation of the visitor management system.