Privacy Policy - Visitors

VISITORS

CONCORDIA MULTI ACADEMY TRUST

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1. Document Control

Amendment History

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1.1	Aug 2025	Change to DPO
1.2	October 2026	Minor amendments to language and change of DPO

Review Dates

Next Review Date
October 2027

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Name	Role
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Reviewer(s)

Name	Role
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Approver(s)

Name	Role
Simon Faircloth	Chief Operating Officer

2. Introduction

Our Trust collects data and information about our visitors so that we can run effectively. This privacy notice explains how and why we collect this data, what we do with it and what rights visitors have.

Concordia Multi Academy Trust is the Data Controller for all the academies within the Trust.

The Data Protection Officer is Matt Larkin and is contactable via cfo@concordiamat.co.uk

This privacy notice describes how we collect and use personal information about you before, during and after your visit, in accordance with the General Data Protection Regulation (GDPR).

Concordia Multi Academy Trust is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

3. Principles

We will comply with UK data protection law. This means that the personal information we hold about pupils must be used lawfully, fairly and transparently; collected only for specified, explicit and legitimate purposes; adequate, relevant and limited to what is necessary; accurate and kept up to date; kept only for as long as necessary; and processed securely.

The type of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. The UK GDPR defines special category data as:

- personal data revealing racial or ethnic origin
- personal data revealing political opinions
- personal data revealing religious or philosophical beliefs
- personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health
- data concerning a person's sex life
- data concerning a person's sexual orientation.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- CCTV footage and other information obtained through electronic means such as swipecard records
- Information about the purpose of your visit
- Photographs (held on electronic sign in systems where used by school)

How is your personal information collected?

We collect personal information about visitors whilst you are on site, for example though telephone calls and emails or letters.

How we will use information about you

We collect and use visitor information only where the law allows us to do so. Depending on the particular purpose, processing will normally be necessary to comply with a legal obligation, to perform a task in the public interest or exercise official authority vested in the Trust, or to protect someone's vital interests. In limited circumstances, we may rely on consent where no other lawful basis applies.

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below.

- Complying with our general safeguarding obligations
- Communicating with stakeholders about the trust
- Delivering the trust's services to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in our constitution and statutory framework
- Business management, administrative and planning purposes
- Sending you communications connected with your role as a visitor
- Complying with health and safety obligations
- To receive advice from external advisors and consultants
- In appropriate circumstances to liaise with regulatory bodies, the Department for Education, the DBS, Local Authority and Health Authorities.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In addition, this Trust may also use CCTV cameras around the school sites for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving visitors will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to discharge our safeguarding obligations) or we may be unable to discharge our obligations which may be in the public interest or for official purposes.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require us to ensure higher levels of data protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our GDPR Policy or Safeguarding policy
- Where it is needed in the public interest and in line with our data protection policy

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Do we need your consent?

We do not need your consent if we use your particularly sensitive information in accordance with our written policy where processing is necessary:

- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and where we provide for suitable and specific measures to safeguard your fundamental rights.

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Automated decision-making

Where a decision based solely on automated processing produces legal effects concerning you or similarly significantly affects you, we will use that processing only where it is permitted by law. We will tell you about the processing and provide the safeguards required by law, including the right to obtain human intervention, express your point of view and challenge the decision.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your data with third parties, including third-party service providers and other organisations.

In particular, we may share your data with organisations including, but not limited to, the following:

- the Local Authority
- the Department for Education
- the Education & Skills Funding Agency
- the Disclosure and Barring Service
- our external HR providers, for example, if you are involved in considering a disciplinary matter
- the Police or other law enforcement agencies
- our IT provider
- our legal advisors / other external consultants
- insurance providers
- our Health and Safety partners

We require third parties to respect the security of your data and to treat it in accordance with the law. Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Some of our service providers may process personal information outside the United Kingdom. Where personal information is transferred to a country or organisation that is not covered by UK adequacy regulations, we will ensure that an appropriate safeguard or other lawful transfer mechanism is in place. You may contact the Data Protection Officer for further information about the safeguards used for international transfers

Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is needed in the public interest or for official purposes or where we have your consent.

Which third-party service providers process your personal information?

“Third parties” includes third-party service providers (including contractors and designated agents).

The following activities are carried out by third-party service providers:

- Visitor sign in
- Health and safety advisors

The following third-party service providers process personal information about you for the following purposes:

- Maintaining sign in records
- Managing health and safety of our schools and facilities
- Pupil safeguarding

Important note

Other parties may process personal information as part of an existing contractual arrangement between the Trust and the third party.

For further details, please contact the Data Protection Officer.

How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example if there are changes to the Trust in future. We may also need to share your personal information with a regulator or to otherwise comply with the law.

From time to time, we may disclose your personal data in response to a request for information pursuant to the Freedom of Information Act 2000 or following a data subject access request. We may approach you for your consent but, in any event, we will only disclose your personal data if we are satisfied that it is reasonable to do so in all the circumstances. This means that we may refuse to disclose some or all of your personal data following receipt of such a request.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties who are processing personal data on our behalf will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

Details of retention periods for different aspects of your personal information are available in our Data Retention Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a visitor we will retain and securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

The legal timescales for the Trust to respond to a Subject Access Request is one calendar month. As the school / trust has limited staff resources outside of term time, we encourage you to submit any Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our GDPR Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice.

If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email which can be obtained from https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.