



**PRIVACY NOTICE: RLT Visitors**

**ADOPTED: Spring Term 2026**

**REVIEW PERIOD: Annually**

**REVIEWER: Data Protection Officer**

## 1. Introduction

The Rowan Learning Trust collects, holds, uses and shares information about those who visit the Trust and its schools.

Much of the information we collect is classed as 'personal data' and our use of it is covered by a set of rules called the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025. For the purposes of Data Protection legislation, the Rowan Learning Trust is a data controller and is registered as such with the Information Commissioner's Office.

You have rights around the data collected, including knowing how and why we are processing the data. "Processing" data means everything from collecting, to storing, using, sharing and disposing of it.

This document tells you more about:

- The information we collect;
- What we use the information for;
- How your information is stored and how long we keep it;
- What rights you have to the information.

## 2. What Information do we collect and use about staff?

We collect, use, store and share (when appropriate) a variety of information about you which includes, but is not limited to:

- Personal details – such as title, full name;
- Contact details;
- Vehicle registration;
- Arrival and departure time;
- Work you are here to see;
- Company/Organisation who work for/represent;
- Information about your use of Trust/school IT devices and networks.

We also are required to collect and use information that is given additional protection under the GDPR – **special category data**, including but not restricted to:

- Photographs for identification purposes;
- Information about any access arrangements that may be required, including if assistance is required should we need to evacuate a building;
  - Photographs of you or images on CCTV\*;
  - Details of your DBS, if necessary.

We may also hold data about you that we have received from other organisations, including other schools, social care and the police.

Whilst the majority of information we collect is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional.

In addition:

- Schools also use CCTV cameras around their site(s) for security purposes and for the protection of staff, learners and visitors. CCTV footage may be referred to during the course of disciplinary procedures (for staff or learners) or to investigate other issues.
- The school may record external telephone calls for training and monitoring purposes. Personal data referred to within such a call recording may be transcribed and/or referred to when supporting student learning, when supporting students' health/welfare (including their vital interests) or when resolving other issues.

### **3. Why we collect and use this information.**

Under the DUAA, the Trust must demonstrate that all purposes for collecting visitor information are proportionate, necessary, and properly documented as part of strengthened public-sector accountability requirements.

We use the information to:

- Identify you as part of our obligations to safeguard children;
- For health and safety including keeping you safe onsite; keeping staff safe and site security & safety;
- Provide appropriate access arrangements;
- Maintain accurate records of visits to our site(s);
- Keep our networks and devices safe from unauthorised access and prevent malicious software from harming our networks;
- Meet legal requirements placed on us.

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

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

### **4. The legal basis for using this information**

The personal data collected is essential in order for the Trust and its schools to fulfil their official functions and meet legal obligations as outlined in Section 3. Processing is necessary for:

- Compliance with a legal obligation [Article 6(1)(c)];
- Performing a task carried out in the public interest [Article 6(1)(e)];
- Legitimate interests [Article 6(1)(f)]

The ways we collect and use special category information are lawful based on:

- Explicit consent;
- For compliance with certain legal obligations;
- For exercising certain legal rights;
- For protecting a person's vital interests in an emergency;
- For health and public health reasons;

- For carrying out tasks that are in the substantial public interest including for safeguarding purposes.

### **Recognised Legitimate Interests (Article 6(1)(ga))**

Under the Data (Use and Access) Act 2025, we may process visitor data where it is necessary for specific, pre-approved public-interest purposes (such as safeguarding, preventing or detecting crime, or regulatory compliance). This lawful basis does not require the standard balancing test but continues to require proportional processing.

Where we use **special category data**, we process this under exemptions from Section 9 of GDPR.

**Biometric Systems** – where a school operates a biometric system for identification (where used, these are usually fingerprint-based systems found in catering/library applications but can include door entry and other systems) then the school will require explicit written consent from each intended user.

**Marketing purposes** - Where a visitor gives us consent, we may send them marketing information by text message or email, such as promoting school events, campaigns or charities. **Consent can be withdrawn at any time by contacting us (see the Contacts section)**

**Automated decision making & profiling** - We do **not** use any personal information to make automated decisions about our learners or their families, or to profile them. If automated or algorithmic systems are introduced in future that make decisions affecting visitors, we will update this notice to explain how those decisions are made and your right to request **human review**, in line with DUAA safeguards.

**Filtering and Monitoring Purposes** – We monitor the use of our ICT network and equipment. We do this so that we can:

- Comply with Health & Safety and other legal obligations;
- Comply with our policies, including Safeguarding & Child Protection, Online Safety, Remote Learning and Acceptable Use of ICT as well as other statutory obligations;
- Keep our networks and devices safe from unauthorised access and prevent malicious software from harming our networks.

## **5. Collecting this information**

We collect this information in a variety of ways, including but not limited to:

- information you provide voluntarily when you sign into school;
- your organisation's ID card or other identity documents such as your driving license;
- correspondence from and meetings with you;
- our CCTV systems;
- the Department for Education (Section 128);
- where appropriate, the DBS Service and Teaching Regulation Agency;
- the police, courts or tribunals;
- the local authority;
- social media checks (in line with KCSIE guidance).

Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. We will inform you at the point of collection, whether you are required to provide certain information to us and your rights in relation to this.

## 6. Storing your personal data

As required under the DUAA, the Trust maintains enhanced governance and accountability measures including documented processing records, staff training in data protection, and transparency regarding data-sharing decisions.

Anyone visiting one of our sites is required to sign in using InVentry. Data collected during this process, including digital images is stored on a standalone hard drive which is encrypted. Details of InVentry's Privacy Notice can be found here [InVentry Privacy Notice - Education | InVentry](#)

Some of the personal data that we collect and use/process is stored in the Trust's Microsoft 365 account. This is a cloud-based platform with personal data being held on Microsoft servers based within the EU. Other data, depending on why we use it will be kept on other systems (see Section 8) or in paper files which are held in secure storage. We also use email to enable authorised users to transfer information to one another. These emails are always encrypted.

Most of the personal data that we collect and use is added to your personnel file. Other data, depending on its purpose, will be kept in other systems or in manual files. We use email to enable authorised users to transfer information to one another.

We dispose of all personal information securely when we no longer need it.

If you would like to know how long we will keep a specific piece of personal data, please contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.

## 7. Requesting access to your personal data and other rights

**Right of Access** - you have the right to access/view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR. Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

To have access to your personal data we will need to collect details of what you want and in the first instance you can contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.

### Subject Access Requests under the DUAA 2025

When responding to a request for access to your personal data, the Trust must conduct only **reasonable and proportionate** searches.

We may **pause the statutory response timeframe** where identity verification or scope clarification is needed. You will be informed if this occurs.

You also have the right to:

- **be informed** about the collection and use of your personal data;
- **correction** - have inaccurate personal data corrected/rectified, or completed if it is incomplete;
- **be forgotten** - have your data erased, often known as the 'right to be forgotten'; however, this does not apply where, amongst other things, processing is necessary to comply with a legal obligation;
- **restriction** - limit the way we use your information, although, as above this is a limited right;
- **objection** - object to the way we are using your information; though other than for

marketing purposes, this is also limited as above.

### **Other Rights you have**

You also have rights in relation to automated decision making and profiling, though these are not currently relevant as we do not carry out automated decision making or profiling.

**Right to withdraw consent** - where we rely on your consent to collect and use personal data, you have the right to withdraw that consent. This applies if you change your mind, or you are unhappy with our use of your personal data. **Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Lead at school.** Once we receive this, we will stop using your data.

**Right to complain** - Data Protection Complaints Process (mandatory under DUAA 2025)  
(Updated for DUAA 2025)

Before raising a concern with the ICO, the DUAA 2025 requires that you first use the Trust's internal data-protection complaints procedure. To make a complaint:

- contact the Data Protection Lead in the first instance;
- if unresolved, the matter will be considered under the Trust's internal data-protection complaints procedure;
- you may then escalate to the ICO once the internal process is complete.

**We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:**

- Your right to have all personal data deleted or destroyed does not apply when the lawful basis for processing is legal obligation or public task;
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests;
- Right to object to the use of your private data does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you do not have the right to object, but you have the right to withdraw consent.

## **8. Sharing your personal data**

All sharing of visitor information is assessed for necessity, proportionality and compliance with the enhanced accountability expectations introduced under the DUAA. 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. In some instances, we may be required to include special category data in the information we provide.

Examples of people we share personal data with are:

- Local Authority (LA) (to meet our legal obligations to share certain information with it, such as safeguarding concerns);
- Our Local Governing Committees (LGC) and/or Trust Board and sub-committees;
- Other academies within the Trust;
- The Trust's auditors;
- The Department for Education, including where necessary the Teaching Regulation Authority;



- The Disclosure and Barring Service (DBS);
- Appropriate regulators – such as Ofsted, Regional Directors, Companies House;
- Police, Courts and/or Tribunals;
- Other authorities/agencies for safeguarding purposes;
- Our suppliers and service providers used by school (and our Trust) to carry out day-to-day processes and requirements. For example, but not limited to:
  - Arbor – our MIS system;
  - Microsoft 365 and TEAMS – our workspace including emails;
  - Online SCR – used to manage our single central record;
  - Social media platforms such as X, Instagram and Facebook.

Where we share your personal data with someone who is a supplier 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.

#### **a) International Transfers**

Where personal data is transferred outside the UK or EEA, the Trust applies the DUAA's "data protection test," ensuring that the level of protection in the destination country is **not materially lower** than that in the UK. Appropriate safeguards (such as International Data Transfer Agreements) will be used where required.

Personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers please contact us to speak to our Data Protection Officer.

#### **b) Freedom of Information Act and environmental Information Regulations 2004**

As a public body, both TTAPA and our Trust are subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws. For example, we may receive a request asking about numbers of staff with particular levels of professional qualification.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

### **9. Why we regularly share school workforce information**

**We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.**

### **10. How Government use your information**

We share personal data with the Department for Education (DfE) on a statutory basis. We are required to share information about our employees with DfE under the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework [Security policy framework - GOV.UK](#).

For more information about the Department's data sharing process, please visit: [How DfE shares personal data - GOV.UK](#)

The workforce data we share with the DfE through data collections:

- Informs departmental policy on pay and the monitoring of the effectiveness and diversity of the Trust workforce;
- Links to our funding and expenditure;
- Supports 'longer term' research and monitoring of educational policy.

There is a link on our website to the DfE's

#### **a) Data collection requirements**

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision).

All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to: [Data collection and censuses for schools - GOV.UK](#)

#### **b) Sharing by the Department**

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis;
- Producing statistics;
- Providing information, advice or guidance.

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use.

Decisions on whether the DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data;
- The purpose for which it is required;
- The level and sensitivity of data requested; and
- The arrangements in place to securely store and handle the data.



To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

If you need more information about how the DfE collects and uses your information, please visit:

[How DfE shares personal data - GOV.UK](#)

### **c) How to find out what personal information the DfE hold about you**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data;
- for a description of the data they hold about you;
- the reasons they're holding it and any recipient it may be disclosed to;
- for a copy of your personal data and any details of its source.

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below: [Personal information charter - Department for Education - GOV.UK \(www.gov.uk\)](#)

To contact the DfE please visit: [Contact the Department for Education \(DfE\) - GOV.UK \(www.gov.uk\)](#)

### **11. Updates to this privacy notice**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was approved during summer term 2025. This notice will be updated in line with any further ICO guidance on the Data (Use and Access) Act 2025, expected during 2026.

### **12. Who to contact**

The school and Trust have the responsibility to ensure that your personal data is protected: they are called the data controller. All members of staff work for the data controller. If you have a concern about the way we are collecting or using your personal data, or you have any questions about this privacy notice, we request that you raise your concern with the school in the first instance.

We recommend that you contact the data protection lead (DPL):

Name of Person: Ellen Palmer  
Email address: [e.palmer@hhhs.net](mailto:e.palmer@hhhs.net)  
Contact number: 01942 204640  
Address: Carr Lane, Wigan, WN3 5NY

Trusts are also required to have someone called a Data Protection Officer or DPO. The DPO advises the Trust about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of Person: Chris Bolton  
Email address: [dpo@rlt.education](mailto:dpo@rlt.education)

Contact number: 01942 939022  
Address: 18 Beecham Court, Wigan, WN3 6PR

If you are dissatisfied with our response to your concerns, you can contact the ICO (contact details below) quoting our ICO registration number **Z3180736** and stating that the Data Controller is The Rowan Learning Trust.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 if you prefer to use a national rate number  
Website: <https://ico.org.uk/concerns/>