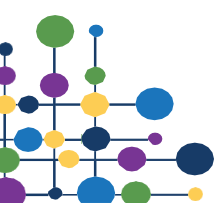
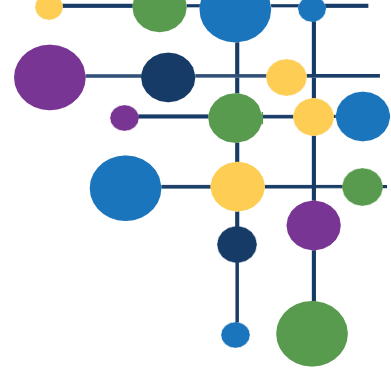


## **VISITORS PRIVACY NOTICE FOR USE WITHIN THE TRUST**

Version	2.0
Name of policy writer	Jayne Newson
Date of last review	6 <sup>th</sup> February 2025
Next review date	June 2027
Approved by Directors or Delegated Authority	1 <sup>st</sup> June 2026





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## Introduction

SHARE Multi-Academy Trust, whose registered office is at Shelley College, Huddersfield Road, Shelley, Huddersfield HD8 8NL is the data controller for the use of personal data in this privacy notice.

The trust is registered with the ICO under registration number ZA479462.

The trust has a Data Protection Officer whose contact details are set out below:

Jayne Newson – Data Protection Officer

Email: [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk)

Tel: 01484 955007

By post to:

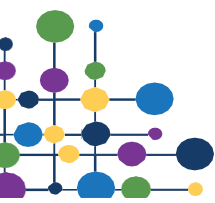
Mrs J Newson  
 Data Protection Officer  
 Heaton Avenue, A SHARE Primary Academy  
 South Parade  
 Cleckheaton  
 West Yorkshire  
 BD19 3AE

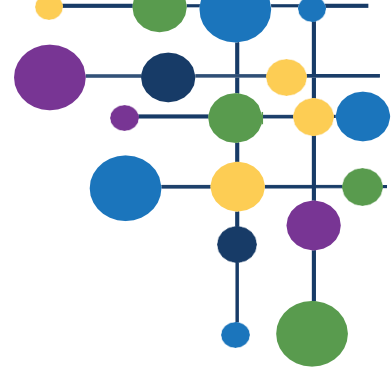
This privacy notice advises visitors of the trust’s data protection responsibilities on the collection and processing of their personal information.

We collect and process your personal data to support the safe and effective operation of the trust and its schools and to manage visits to our sites.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. The trust processes personal data in accordance with UK GDPR, the Data Protection Act 2018, and other applicable UK data protection legislation, including relevant provisions under the Data (Use and Access) Act 2025.

We are required to explain how and why we collect such data and what we do with that information. This notice will also provide information about your personal information that is held and processed by us.





## The categories of information that we process

The categories of personal information that we process include the following:

- Contact details
- Name
- Information relating to your visit (i.e. your organisation, arrival time and departure, car registration plate)
- Photograph on arrival
- Proof of DBS (if required)
- Any health conditions which may affect your visit.

This list is not exhaustive.

Where processing is likely to result in a high risk to individuals' rights and freedoms, the trust carries out Data Protection Impact Assessments (DPIAs).

All third party processors handling personal data on behalf of the trust are subject to contractual data protection obligations.

In addition, concerning any special category data including criminal offence information:

Processing is necessary for the purpose of carrying out the obligations in the field of employment law as detailed in paragraph 2 (b) of GDPR - Article 9 and set out in condition 1 of Schedule 1 of the DPA 2018. Disability and access requirements.

## Why we collect and use your information

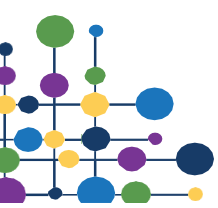
We will only collect visitor information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

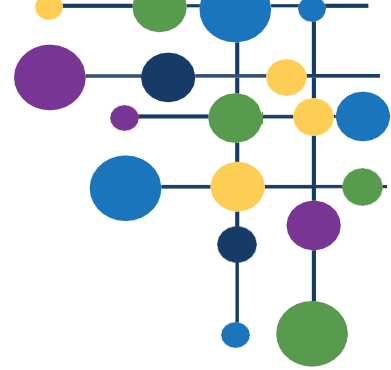
- a) Identify you and keep you safe whilst you are on site
- b) Keep pupils within its schools safe
- c) Maintain accurate records of visits to each of its sites
- d) Provide appropriate access requirements.

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing visitor information are:

- for the purpose of (a), (b), (c) and (d) in accordance with the legal basis of public task: collecting the data is necessary to perform tasks that the trust and its schools are required to perform as part of their statutory function
- for the purpose of (a), (b) and (d) in accordance with the legal basis of vital interests: to keep pupils and you safe
- for the purpose of (c) in accordance with the legal basis of legal obligation: fulfilling our statutory reporting requirements to the Department for Education (DFE).

Some information we process may be considered more sensitive under data protection law, such as safeguarding information, visitor incident records or identification information required for safeguarding and site security purposes. We only use this information where the law allows us to do so and where it is necessary to safeguard pupils, maintain site security, comply with legal obligations and manage visitors safely.





Where CCTV operates on trust or school sites for safety, security, safeguarding and crime prevention purposes, images of visitors may be captured. Access to footage is restricted to authorised personnel and is only permitted where there is a legitimate reason to do so.

### **Storing your information**

We take the security of personal data very seriously. Data is stored in the UK/Ireland, however some service providers may process limited personal data outside the UK. Where this occurs, appropriate safeguards are applied in accordance with UK GDPR. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We hold data securely for the set amount of time shown in our data retention schedule which is aligned with the IRMS Management Toolkit. For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

### **Who we share your information with and why**

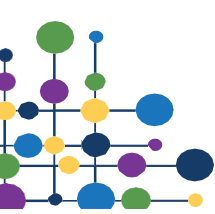
We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

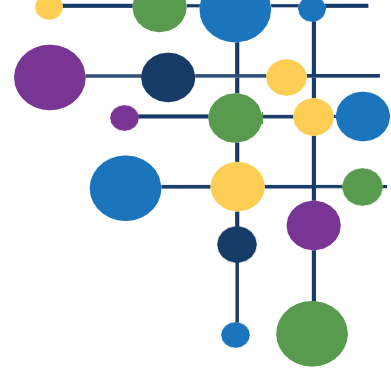
In line with a legal requirement, we may share your personal data with (but not limited to):

- The Local authority- to meet any legal or statutory requirements associated with visitor information and safeguarding
- Police and legal forces - in order to uphold law and order
- Central and local government - to meet statutory and legal duties and to enable the performance of contracts
- The trust auditors - to demonstrate that it has taken appropriate measures in providing its educational services
- Health authorities - to assist where there are legal obligations
- Security organisations - with regard to legal or safeguarding investigations, and to assist in crime prevention, detection and prevention of fraud
- Professional bodies - to verify information for legal purposes
- The organisation/company that you are representing - to verify business interest and to verify information for legal purposes
- Professional advisers and consultants - to comply with entitlements and assist with any claims.

### **The use of Artificial Intelligence (AI)**

The trust may use approved AI tools to support administrative activities. AI tools are not used to make solely automated decisions about visitors. Any use of AI involving personal data is subject to human oversight, security controls and data protection safeguards. The trust currently uses





Microsoft 365 Copilot within its secure Microsoft environment.

Further information about the use of AI can be found in the SHARE MAT Artificial Intelligence Policy & Procedure.

### **Requesting access to your personal data**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the trust's Data Protection Officer, whose contact details are set out at the beginning of this privacy notice.

You also have the right to:

- Restrict our processing of your personal data, i.e. permitting its storage but no further processing
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics
- Have your personal data rectified if it is inaccurate or incomplete
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

We will normally respond to information rights requests within one calendar month.

### **The right to raise concerns, complaints or withdrawal of consent**

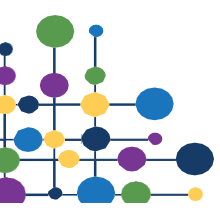
If you have any concerns about the way we collect or process your data or you would like to discuss anything in this privacy notice, please contact the Data Protection Officer in the first instance.

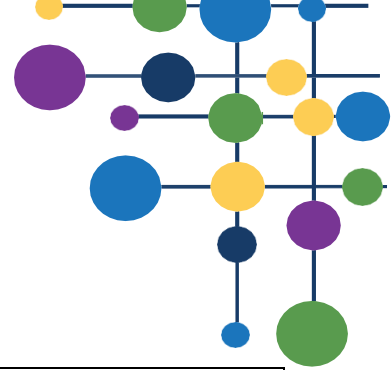
You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. This only applies where consent is the lawful basis and does not affect statutory processing.

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the Gov.UK website, (<https://www.gov.uk/guidance/data-protectionhow-we-collect-and-share-research-data>).

If you require this privacy notice in an alternative format, please contact the Data Protection Officer.





## Schedule of Amendment

Version	Amendment
1.0	New version
2.0	Strengthened the document in terms of AI governance, CCTV transparency, international transfers and DUAA 2025 awareness and technical wording amended to be more reader friendly

