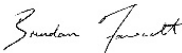




Privacy Notice Visitors

Responsible for policy:	CC2 Strategy, People and Organisational Development
Policy status:	Compliance
Policy review:	Annually
Chair of Directors:	

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Definitions

In this **Volunteer Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Parents and Pupils Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of volunteer at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)
- xv **'Visitor'** a person who goes or comes to a particular person or place. It can also refer to a person appointed to visit, inspect, inquire into, and correct corporate

1. Introduction

The Romero Catholic Academy is the **data controller** for the purposes of UK data protection law. This means we are responsible for how your personal information is collected, used and stored when you visit our schools or sites.

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact the Academy Trust as the Data Controller in writing at:

Helen Quinn DPO

The Romero Catholic Academy

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or admin@romeromac.com

The schools that we look after are: -

2. What is a Privacy Notice?

A Privacy Notice explains how we collect, use, store and share your personal information, and your rights in relation to that information under UK data protection law.

3. What is Personal Information?

Personal information is any data that can identify you, either directly or indirectly.

We may also process **special category data** (such as health information) where necessary, for example to support access requirements or emergency situations

4. What personal information do we process about visitors

We may collect and process the following information when you visit our premises:

Personal data

- Name
- Contact details (where provided)
- Organisation (if applicable)
- Vehicle registration details (where relevant)

Visit information

- Date and time of visit

- Purpose of visit
- Staff member visited

Safeguarding and security data

- Signing-in records
- Identification verification (where required)

CCTV

- Images captured on our CCTV systems while on site

Special category data (where applicable)

- Health or accessibility information (e.g. disability access needs)

5. Why do we use your personal information?

We use visitor data to:

- Maintain site security and safeguarding of pupils, staff and visitors
- Control access to buildings and premises
- Keep accurate visitor records
- Manage emergencies and health and safety procedures
- Support safeguarding investigations where required
- Meet legal and regulatory obligations

6. What are our legal bases for processing your data?

We only process your personal data when the law allows us to.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legal obligation** – to comply with safeguarding and health & safety law
- **Public task** – to operate schools safely and securely
- **Vital interests** – in the case of emergencies
- **Legitimate interests** – for site security and visitor management (where appropriate)

Special category data (Article 9 + DPA 2018 Schedule 1)

Where applicable, we rely on:

- Safeguarding of children and vulnerable individuals

- Substantial public interest
- Vital interests (emergency situations)

Purpose	Data	Lawful basis	Special category condition
Visitor log	Name, visit details	Public task	N/A
Site security	CCTV footage	Legitimate interests / Public task	N/A
Emergency response	Health/access needs	Vital interests	Vital interests
Safeguarding	ID verification, visit records	Legal obligation	Safeguarding

7. Who do we share your information with?

We only share visitor information where necessary and lawful.

This may include:

- Law enforcement agencies (e.g. police)
- Local authority or safeguarding partners
- Emergency services
- Regulatory bodies (e.g. Ofsted, where relevant)
- IT system providers (e.g. visitor management systems, CCTV providers)

Important information:

- Some organisations act as **data processors** on our behalf
- Others are **independent data controllers**

We ensure appropriate safeguards are in place.

8. CCTV

CCTV is in operation across our sites for:

- safeguarding
- crime prevention
- site security

Images are recorded and stored securely and only accessed where necessary and lawful.

Further information is available in our CCTV Policy.

9. International data transfers

Some of our systems (e.g. visitor management or CCTV providers) may store data outside the UK.

Where this occurs, we ensure appropriate safeguards such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

You can request further details from the Data Protection Officer.

10. How long do we keep your information?

We retain visitor data only for as long as necessary.

Typical retention includes:

- Visitor logs: short-term retention (e.g. in line with safeguarding guidance)
- CCTV footage: typically **30 days**, unless required for investigation
- Incident records: retained longer where necessary

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**.

Further details are available in our Records Management Policy.

11. Your Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent (where we rely on it)

To exercise your rights, please contact the Data Protection Officer.

12. Complaints

If you are concerned about how we handle your data, please contact us in the first instance.

You also have the right to complain to the ICO:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF

Helpline: 0303 123 1113
Website: <https://ico.org.uk>

13. Data security

We have appropriate measures in place to protect your information, including:

- secure visitor management systems
- controlled access to data
- staff training in data protection
- secure storage of records

14. Links with other policies

This notice should be read alongside:

- Data Protection Policy
- Information Security Policy
- CCTV Policy
- Safeguarding Policy

15. Monitoring and Review

The Board of Directors delegate the implementation of this privacy notice to the Governing Body.
This Privacy Notice is reviewed annually by CC2 Strategy, People and Organisational Development.