HOLLINGWORTH LEARNING TRUST
VISITORS PRIVACY POLICY

Reviewed:	Spring 2026
Version:	6.1
Next Review:	**Live Document:** To be updated as and when new advice and guidance is received regarding Data (Use and Access) Act 2025, UK GDPR and Freedom of Information.
Approved By:	**To be reviewed by Trustees every 12 months**

VERSION INFORMATION

Version	Reason for Update	Author	Date	Approved By:
1	Original Policy	S Collinge	Spring 2020	CEO
2	Review and Updated	S Collinge	Spring 2021	CEO
3	Reviewed and Updated	S Collinge	Spring 2022	CEO
4	Reviewed and Updated	S Collinge	Spring 2023	CEO
5	Review & Updated Updates to sections 2,3 & 4 to include filtering and monitoring, in line with KCSIE 2023	S Collinge	Spring 2024	Trustees
6	Reviewed and Updated	S Collinge	Spring 2025	Trustees
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1. Introduction

Under UK data protection law, individuals have a right to be informed about how Hollingworth Learning Trust ("the Trust") uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
This privacy notice explains how we collect, store and use personal data about **visitors to the Trust**.

Hollingworth Learning Trust is the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Ms Susan Collinge (see 'Contact us' below).

2. The personal data we hold.

Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Name.
- Contact details.
- Information relating to the visit, e.g. company or organisation name, arrival and departure time, vehicle number plate.
- Information about your use of our information and communication systems, equipment, and facilities (e.g. school computers).

We may also collect, use, store, and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required.
- Photographs for identification purposes.
- Digital Images and CCTV images captured in our schools.

We may also hold data about you that we have received from other organisations, including other schools, local authorities and social services.

Please note, this list is not exhaustive, to access the current list of categories of information we process please contact the Data Protection Officer.

3. Why we use this data.

We use the data listed above to:

a) Identify you and keep you safe while on the school site.

b) Keep pupils and staff safe.

c) Maintain accurate records of visits to the Trust.

d) Provide appropriate access arrangements.

e) Make sure our information and communication systems, equipment, and facilities (e.g. school computers) are used appropriately, legally and safely.

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 another purpose. If we need to use your personal information for an unrelated purpose, we will notify you and 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.

3.1 Use of your personal data in automated decision making and profiling.

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.2 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations.
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations.
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. Our lawful basis for using this data.

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

For the purposes of **(a), (c), (d),** in accordance with the **'public task'** basis, collecting and processing data is necessary to perform tasks that schools are required to perform as part of their statutory function.

For the purpose of **(b)** and **(e),** in accordance with the **'legal obligation'** basis, the Trust is required to collect and process data to meet our responsibilities under law as set out here:

- Safeguarding obligations

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you will go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data.

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

5. Collecting this data.

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities and other schools.
- Government departments or agencies.
- Police forces, courts, tribunals.

6. How we store this data.

We keep personal information about you while you are visiting our schools. We may also keep it beyond your visit to our schools for the set amount of time as shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit http://irms.org.uk/page/SchoolsToolkit

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.

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data with.

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- **Our local authority, Rochdale Borough Council** – to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- **Government departments or agencies.**
- **Our regulator, Ofsted.**
- **Suppliers and service providers**
- **Security organisations.**
- **Health and social welfare organisations.**
- **Professional advisers and consultants.**

Police forces, courts, tribunals.

8. Your rights

8.1 How to access personal information that we hold about you.

Under data protection legislation, you have the right to request access to information we hold about you. You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it.
- Tell you why we are holding and processing it, and how long we will keep it for.
- Explain where we got it from, if not from you.
- Tell you who it has been, or will be, shared with.
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give you a copy of the information in an intelligible form.
- If you make a Subject Access Request (SAR), we may ask you for clarification to help us locate the data you need. Under the Data (Use and Access) Act 2025, the statutory time limit for our response may be paused ('stopped the clock') until we receive this clarification from you.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data.

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data.
- Prevent your data being used to send direct marketing.
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person).

  (We do not currently use automated decision-making processes that produce legal or similarly significant effects. If this changes, we will update this notice and implement suitable safeguards including the right to human intervention.)
- In certain circumstances, have inaccurate personal data corrected.
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing.
- In certain circumstances, be notified of a data breach.
- Make a complaint to the Information Commissioner's Office.
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Please note that under the Data (Use and Access) Act 2025, the ICO may typically expect you to have raised your concern with us and given us an opportunity to respond before they will investigate a complaint.

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

- Ms Susan Collinge, Compliance Manager on 01706 292828 or via email at dpo@hltrust.co.uk
- In writing to the Trust at: Hollingworth Learning Trust
Suite 1, Floor 1
Hafley Court
Buckley Road
Rochdale
OL12 9DJ
- Our Local Authority: http://www.rochdale.gov.uk/