Privacy Notice for Visitors
How we use your information

2026/2027

Who are we?
Castle Phoenix Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Castle Phoenix Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z6078008.

You can contact the Academy Trust as the Data Controller in writing at:
Castle Phoenix Trust, Axholme Road, Coventry. CV2 5BD or enquiries@castlephoenixtrust.org.uk

What is a Privacy Notice?
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about visitors.

What is Personal Information?
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about visitors to our school?
The personal data that we may collect, use, store and share (where appropriate) about you includes:

- Full name
- Car registration
- Contact details and contact preferences
- If a regular professional visitor evidence that the individual holds an Enhanced Disclosure and Barring Service certificate
- Employer details
- Photographs
- CCTV images captured in school

We may also collect, hold and share the following "special categories" of more sensitive personal information:

- Information about your health or any relevant disabilities.

How is your personal information collected?

We collect personal information about visitors when you sign into our school premises. This information is stored within our electronic signing in system/visitor book.

We may also collect information ahead of your visit to our school/trust, which we collect directly from you or the person arranging your visit. E.g., the organisation you work for.

For what purposes do we use visitors' personal information?
We will use your personal information 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 school
d) Provide appropriate access arrangements

Who might we share your information with?
Appropriate security measures have been put in place to prevent personal information being accidentally lost, used or accessed in an unauthorised way.

We will not share your personal data with third parties unless we have a lawful basis to do so. For example, we may share your data with third-party software providers who host and support our visitor management system, but only where they act as data processors under a written contract.

Our Lawful Basis for Processing your Data
Our lawful basis for processing your information for the purposes listed above are:

- To comply with the law
- To fulfil a public task
- To protect your vital interests or those of someone else
- For purposes of substantial public interest
- Where we have asked for your consent to use your information
- Where we have identified a legitimate interest, such as:
    - Ensuring site security and safeguarding
    - Managing visitor access and records
    - Preventing unauthorised access and protecting school property

What do we do with your information?
All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

How long do we keep your information for?
In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolToolkit

Transferring data internationally
Where we transfer personal data to a country or territory outside of the UK, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?
Under data protection law, individuals have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

**Please ensure you specify which School your request relates to.

You also have the right to:

- object to processing of personal data in certain circumstances and where the processing is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a complaint about how your data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This allows us to investigate and resolve the issue as quickly as possible.

- Trust DPL Email: emma.phillips@castlephoenixtrust.org.uk
- School/Trust DPO: Schooldpo@warwickshire.gov.uk

When you contact us, please provide as much detail as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to Expect from us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.

- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed at the beginning of each academic year.