

The Howard Partnership Trust

Visitors Privacy Notice

Data controller:

The Howard Partnership Trust, ICT Department, Lower Road Effingham, Surrey, KT24 5JR.

Data Protection Officer: dpo@thpt.org.uk

Under UK Data Protection law, individuals have a right to be informed about how The Howard Partnership Trust (THPT) 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.

The Howard Partnership Trust (THPT) collects and processes personal data relating to its visitors to manage visits to the Trust and its academies and to keep everyone on site safe. THPT is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does THPT collect?

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 your visit, e.g. your company or organisation name, arrival and departure time, car number plate.

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
- CCTV images captured in an academy

Why we collect and use this data

We use the data listed above to:

- Identify you and keep you safe while on the trust site or an academy site
- Keep pupils and staff safe
- Maintain accurate records of visits to each academy
- Provide appropriate access arrangements

Our legal basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Less commonly, we may also use personal information about you where:
- We need to carry out a task in the public interest
- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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 would go about withdrawing consent if you wish to do so.

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 UK 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 are 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 UK 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 are 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.

Collecting this information

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
- Government departments or agencies
- Police forces, courts or tribunals

How we store this data

We keep personal information about you while you are visiting the trust or an academy site. We may also keep it beyond your visit if this is necessary. Our Records Management Policy sets out how long we keep information about visitors. 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 need it.

Data sharing

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 - to meet our legal obligations to share certain information with it, such as where the visitor information is relevant to a safeguarding concern
- The Department for Education - to meet our statutory and legal obligations to share certain information with them
- Educators and examining bodies - necessary in the performance of our education function
- Our regulator, Ofsted - to enable it to evaluate the education we provide, and which is in the public interest
- Suppliers and service providers - to enable them to provide the service we have contracted them for
- Central and local government - to meet statutory and legal duties and to enable the performance of contracts
- Our auditors - to demonstrate that we have taken appropriate action in providing our education service
- 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
- Health and social welfare organisations - to support a legal entitlement
- Professional advisers and consultants - to support a legal entitlement and to assist with insurance claims
- Police forces, courts, tribunals - in order to uphold law and order

- Professional bodies - to verify information for legal purposes
- The organisation/company you are representing - to verify business interests and to verify information for legal purposes

Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law. In cases where we must set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

Your rights

Under data protection legislation, you have the right to request access to your information that we hold. To make a request for your personal information, contact your school principal or DPO@THPT.org.uk.

You also have the right to:

- Ask us for access to information about you that we hold
- Be informed about the collection and use of your personal data
- Have your personal data rectified, if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- 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/historical research and statistics
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- Withdraw consent at any time where relevant
- Complain to the ICO.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests.

And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Data Protection Officer.

Complaints

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by completing the form on our school website and finally if not satisfied directly to the Information Commissioner's Office at <https://ico.org.uk/concerns>.

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong. You can make a complaint at any time by contacting our data protection officer via the form on the website.

You can also complain to the Information Commissioner's Office in one of the following ways:

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

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 - dpo@thpt.org.uk

Automated decision-making

THPT does not make decisions about visitors based on automated decision-making.

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated June 2026.

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