

Include Wales

VISITORS PRIVACY NOTICE

Classification: Official

Last updated: January 2026

1. Introduction

Include Wales is committed to protecting the privacy and security of all individuals who visit our premises. This Privacy Notice explains how we collect, use, store, and share personal information relating to **occasional and professional visitors**.

For the purposes of data protection law, **Catch22 is the data controller**.

Data Protection Officer (DPO):

Michael Oniyitan

Email: DPO@catch-22.org.uk

This Privacy Notice applies to all visitors who are required to **sign into the school's visitor management system**.

Who is *not* classed as a visitor?

The following individuals are *not* considered visitors for the purposes of this Notice:

- Parents/carers/guardians dropping off or collecting a child at normal start/end of the school day
- Parents/carers/guardians attending the office briefly for enquiries
- Parents/carers/guardians collecting a child during the school day

These individuals form part of everyday parent/carer contact and are covered by other privacy notices.

For more information, please refer to our **Visitor Policy** available on the school website.

2. The Information We Collect

Depending on the purpose of your visit, we may collect, store, and process:

Personal Information

- Name
- Address
- Email address and/or telephone number
- Nature of your visit
- Organisation or employer (where relevant)

Access, Premises, and Contractual Information

- Sign-in/out times
- Premises arrangements (e.g., rooms used, rental agreements, bookings)
- Financial transactions relating to premises use (where applicable)

Special Category Data (where relevant)

- Vetting and barring information (e.g., DBS status for contractors/partners)
- Age, gender, ethnicity (only where required by law or safeguarding arrangements)

Images and Security Information

- CCTV footage captured on-site
- Photographs for visitor ID badges (if required for safeguarding or evacuation procedures)

We will always explain when data is mandatory and what happens if it is not provided.

3. Why We Use This Data

We process visitor information to:

- Maintain a safe and secure environment for pupils, staff, and visitors
 - Safeguard children and ensure compliance with safeguarding requirements
 - Support the operational running of the school
 - Manage building security and emergency procedures
 - Comply with legal and regulatory requirements
 - Maintain accurate records of attendance on the premises
 - Ensure health and safety obligations are met
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4. Lawful Bases for Processing

We process visitor personal data under the following lawful bases:

Article 6 UK GDPR

- **6(1)(c) – Legal obligation:** complying with safeguarding, health and safety, counter-terrorism, and regulatory requirements
- **6(1)(e) – Public task:** delivering education services and maintaining a safe environment
- **6(1)(f) – Legitimate interests:** ensuring site security, visitor identification, and emergency response

Article 9 UK GDPR (special category data)

Where necessary:

- **9(2)(b):** employment, social security, and protection law (e.g., DBS requirements)
- **9(2)(g):** substantial public interest (safeguarding)
- **9(2)(a):** explicit consent (only where consent is genuinely optional)

Where consent is used, you may withdraw this at any time.

5. How We Collect Visitor Information

Information is collected directly from you when you:

- Sign in via the visitor management system
- Provide information relevant to safeguarding, site access, or meeting arrangements
- Request the use of school facilities (e.g., room bookings)

Some information is mandatory in order to meet our safeguarding and security responsibilities.

6. How We Store Your Information

Visitor information is stored securely using:

- Approved Catch22 systems
- The school's visitor management system
- Secure internal filing systems (where required)

We keep visitor data only for as long as necessary to fulfil the purposes outlined above and in line with the **Catch22 Data and Record Management Retention Schedule**.

7. Who We Share Visitor Information With

We may share visitor information with:

- Local authorities (including safeguarding teams)
- Police or emergency services (where required)
- Regulatory bodies and inspectorates
- Partner agencies with a safeguarding interest
- Contractors or service providers acting on behalf of the school
- Health services (e.g., in relation to accidents or health incidents)

We **do not** share visitor information with third parties for marketing purposes.

Information is only shared when:

- Required by law
 - Necessary for the safety or wellbeing of pupils or staff
 - Required as part of safeguarding procedures
 - Necessary to fulfil contractual or operational requirements
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8. Your Data Protection Rights

You have the right to:

- Request access to your personal data
- Request correction of inaccurate data
- Request erasure or restriction of processing (in certain circumstances)
- Object to processing where legally applicable
- Raise a complaint with the **Information Commissioner's Office (ICO)**

ICO: <https://ico.org.uk/concerns/>

To exercise your rights, contact: DPO@catch-22.org.uk

9. If You Have Questions

If you would like to discuss anything in this Privacy Notice, contact:

Data Protection Officer

Catch22

Email: DPO@catch-22.org.uk

10. Updates to This Notice

We review this Notice regularly.

The most recent version will always be available on the school website or upon request.

Version updated: January 2026