



Loughborough
Schools Foundation

Nursery • Fairfield • Grammar • High

Privacy Notice for Events, Venues and Holiday Courses (Commercial Bookings)

Document Management Information

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Policy Author:	James Leeson, Data Protection Officer
Approved By:	<u>David Goodacre, Bursar</u>
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Dissemination:	The policy will be available to staff via the Policies SharePoint.

Revision History

Version	Description of Revision	Date Approved
1.0	Adopted ISBA guidelines, with customisation to the Foundation.	June 2024
1.1	New version on Foundation template. Minor edits to structure and sentence structure.	January 2026

1. Who we are

Loughborough Schools Foundation (LSF) is the organisation (referred to in this policy as “the Foundation”) responsible for three Independent Schools and a nursery operating under a single Board of Trustees. The Foundation comprises Fairfield Preparatory School (co-educational, 3-11), Loughborough Grammar School (boys, 10-18, day and boarding), Loughborough High School (girls, 11-18), and ‘The Nursery’ for children from 6 weeks to 4 years.

The Foundation is incorporated as a company limited by guarantee, number 4038033, and is a registered charity, number 1081765.

The Foundation is registered as the Data Controller under Data Protection Law and will observe the provisions of all related legislation, as well as frameworks provided by the Department for Education (DfE), to all Schools and departments within the Foundation. This includes Early Years Foundation Stages (EYFS), The Nursery, alumni associations, and any subsidiary companies.

2. Who this notice applies to

This privacy notice applies to:

- Individuals and representatives of organisations who inquire about, book, or use our venues and event services for commercial purposes;
- Attendees, delegates, or participants at events held at our venues;
- Suppliers, contractors, or service providers involved in the delivery of events or services at our venues;
- Visitors to our premises for the purpose of viewing our facilities or attending events;
- Users of our website or online booking systems related to our events and venues services.

This notice applies whether you are acting as an individual or on behalf of an organisation, and whether you are a prospective, current, or past client or service user.

Please note that if you are an employee, student, or alumni of Loughborough Schools Foundation, separate privacy notices may apply to you in those capacities. This notice is specifically for those engaging with our commercial events and venues services.

If you provide us with personal information about other individuals (such as your colleagues or event attendees), you are responsible for ensuring that you have the right to share that information with us and that those individuals are aware of how their information will be used as described in this notice.

3. About this privacy notice

This Privacy Notice explains how the Foundation processes your personal data and your rights in relation to the personal data we hold about you.

This Privacy Notice applies in addition to the Foundation's other relevant terms and conditions and policies that may (depending on your role and status) apply to you, including:

- any contract between you and the Foundation, such as the terms and conditions of employment, and including the staff code of conduct and any applicable staff handbook;

- the Foundation's CCTV and/or biometrics policy;
- the Foundation's retention of records policy;
- the Foundation's disciplinary, safeguarding, pastoral, anti-bullying, or health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded (both by and about staff);
- the Foundation's data protection policy; and
- the Foundation's IT policies, including its Acceptable Use policy, Online Safety policy, Social Media policy

Please note that any contract you may have with the Foundation will be relevant to how the Foundation processes your data, in accordance with any relevant rights or obligations under that contract. However, this Privacy Notice is the primary document by which we notify you about the processing of your personal data by the Foundation.

This Privacy Notice also applies alongside any other information the Foundation may provide about particular uses of personal data, for example when collecting data via an online or paper form.

If we ask for your personal information, we will:

- tell you the reasons why we're asking for it;
- only ask for the information we need;
- make sure we don't keep it for longer than necessary;
- protect it and make sure only the appropriate people have access to it;
- let you know if we'll share it with other organisations;
- keep it up to date where necessary and let you know if you need to notify us about changes to your circumstances;
- consider privacy risks when we're planning to change the way we use or hold it; and
- train our staff to ensure we properly use and protect it.

4. How we collect your information

4.1 Before you are engaged with the Foundation, we may collect your personal data in a number of ways, for example:

- from the information you provide to us before making a booking or site visit;
- when you submit a formal application to book a venue or event; and
- from third parties, for example the website School Hire.

4.2 During the course of your engagement with us, we will collect data from or about you and your child/ren if relevant, including:

- when you provide or update your contact details;
- when you provide or update details of your child/ren for a holiday course;
- when you provide or update next of kin or emergency contacts for your child/ren for holiday courses;
- when you provide or update medical or allergy information for your child/ren for holiday courses;
- in various other ways as you interact with us during your event or venue hire, and afterwards, where relevant, for the various purposes set out below.

5. Types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

5.1 Contact and communications information, including:

- your contact details (including email address(es), telephone numbers and postal address(es);
- contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
- records of communications and interactions we have had with you;

5.2 Biographical, educational, and social information, including:

- your name, title, gender, nationality and date of birth;
- your child/ren/s name, title, date of birth, current school and school year;
- whether you permit use of your child/ren/s image in marketing.

5.3 Financial information, including:

- your childcare voucher code number and voucher provider;

5.4 Medical and welfare information, including:

- information concerning your own or your child/ren/s health and medical conditions (for example, allergies or injuries);
- dietary requirements (either for yourself or your child/ren depending on the event)

5.5 Where necessary and with appropriate safeguards, we may also collect special categories of data, including:

- information concerning your health and medical conditions;

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your child's education or your relationship with the Foundation.

6. Reason for processing your personal data, how that data is used and whom it is shared with

6.1 Entering into, or fulfilling, our contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes (this is for large commercial bookings only, e.g. large residential):

- administering holiday courses, commercial events and bookings, where relevant;
- carrying out due diligence checks on you, whether during the application process with us or during your engagement with us, including checking any references;
- once you are engaged by us in any capacity, for the performance of the contract between you and us;
- monitoring your use of our IT systems to ensure compliance with our policies (including the Foundation's IT Acceptable Use Policy);

- for internal record-keeping, including the management of any feedback or complaints and incident reporting; and
- for any other reason or purpose set out in your contract with us.

6.2 Legitimate Interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the Foundation in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal data for the following:

- To administer holiday courses, commercial events and bookings;
- to provide you with information about us;
- for security, safeguarding, welfare, and investigation purposes, including by operating security cameras in various locations on the Foundation's premises;
- to enable relevant authorities to monitor the Foundation's performance and to intervene or assist with incidents as appropriate;
- to safeguard staff and pupils' health and welfare;
- to carry out or cooperate with any school or external complaints, disciplinary or investigatory process;
- for the purposes of management planning and forecasting, research and statistical analysis;
- to contact you or your family members and 'next of kin' for emergency purposes;
- to publish your image and likeness in connection with your engagement with us;
- to monitor (as appropriate) use of the Foundation's IT and communications systems in accordance with the Foundation's IT Acceptable Use Policy and government guidance such as KCSIE;
- Healthy and safety;
 - Workplace safety & security;
 - Protecting employees and the public;
 - Managing risk and liability.

6.3 Legal obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity law, tax law and accounting, and child welfare. In this respect, depending on your role and status, we are likely to use your personal data for the following:

- child welfare (including following the requirements and recommendations of KCSIE, e.g. single central register), social protection, diversity, equality, and gender pay gap monitoring, employment, immigration / visa sponsorship compliance and health and safety;
- for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax,
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

6.4 Special categories of data

Depending on your role and status, we process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations (treated for these purposes as special category data) for the reasons and purposes set out below.

In particular, we process the following types of special category personal data for the following reasons:

- to investigate complaints made by you or others, for example concerning discrimination, bullying or harassment, or as part of a complaint made against the Foundation;
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or via a self-declaration, or where a matter of public record (online or by any media), or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

We will process special categories of personal data for lawful reasons only, including because:

- you have given us your explicit consent to do so, but only in circumstances where seeking consent is appropriate;
- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- it is necessary for the purposes of carrying out legal obligations and exercising legal rights (both yours and ours) in connection with your employment or engagement by us;
- it is necessary in connection with some function in the substantial public interest, including:
 - the safeguarding of children or vulnerable people; or
 - to prevent or detect unlawful acts; or
 - as part of a function designed to protect the public, pupils or parents from seriously improper conduct, malpractice, incompetence or unfitness in a role, or failures in services by the Foundation (or to establish the truth of any such allegations); or
 - or to cooperate with a relevant authority, professional or regulatory body (such as the ISI, DfE, LADO or TRA) in such matters
- to comply with public health requirements (e.g. in respect of Covid-19 (or in similar circumstances); or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

7. Low-level concerns about adults

We will process personal data about you, whether or not it constitutes special category data, in accordance with our policy on recording and sharing low-level concerns about adults. This will be processed for the same safeguarding and/or employment law reasons as set out above.

8. Sharing your information with others

For the purposes referred to in this Privacy Notice and relying on the grounds for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other employees, agents, and contractors (e.g. third parties processing data on our behalf as part of administering IT systems, educational platforms, catering services etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- relevant government authorities (e.g. Department for Education, HMRC, police, Home Office, Prevent, a relevant public health / NHS body and / or local authority) and/or

appropriate regulatory bodies (e.g. the Independent Schools Inspectorate, the Charity Commission etc.);

- other schools or departments within the Foundation where appropriate;
- educational and examining bodies;
- health authorities and medical professionals, including the school's designated medical officer and therapists;
- external auditors or inspectors;
- IT service providers;
- Third parties and their advisers in certain situations where we establish new working relationships or partnerships, either within the UK or internationally;
- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants;
- when the school is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or Police.
- future schools, colleges, and universities that the pupil may attend;
- otherwise, where reasonably necessary for the operation of the Foundation and its educational and pastoral obligations.

We may also share information about you with other education providers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations. References given or received in confidence may not be accessible under your UK GDPR rights.

9. How long your information is kept

Subject to any other notices that we may provide to you, we may retain your personal data for a period of no earlier than six years after your contract has expired or been terminated. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements. Please see our Retention of Records policy.

10. Your rights

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The Foundation will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one

month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

11. Responsibility and data protection

The Foundation has appointed a Data Protection Officer who will deal with all requests and enquiries concerning the Foundation's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Data Protection Officer can be contacted on dataprotection@lsf.org

12. Contact and complaints

If you have any queries about this Privacy Notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Data Protection Officer by emailing dataprotection@lsf.org or writing to 3 Burton Walks, Loughborough, Leicestershire, LE11 2DU

If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to the Information Commissioner: www.ico.org.uk. The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral.

13. This notice

The Foundation will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.