



Loughborough
Schools Foundation

Nursery • Fairfield • Grammar • High

Privacy Notice for Parents and Students

Document Management Information

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Policy Author:	James Leeson, Data Protection Officer
Approved By:	David Goodacre, Bursar
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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.	Jan 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 parents, carers, and guardians of current, former, and prospective pupils at the Foundation, as well as to pupils themselves. Where we refer to “parents” in this notice, this includes carers and legal guardians. Where we refer to “you” or “your”, this means parents and/or pupils as appropriate to the context.

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
- 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;
- 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 your child is enrolled at the Foundation, we may collect your personal data in a number of ways, for example:

- from the information you provide to us during the initial inquiry or admissions process;
- when you submit a formal application for your child to join us, and provide personal data in application forms, registration documents, or consent forms;
- when you and your child attend admissions interviews or assessment days; and
- from third parties, for example your child's previous school, local authorities, or healthcare providers, in order to verify details about your child and/or their application to join us.

4.2 During your child's time at the Foundation, we will collect data from or about you and your child, including:

- when you provide or update your contact details;
- when teachers or other staff members complete reports or records about your child's academic progress, behaviour, or special educational needs;
- in the course of your child's education more generally, including through classwork, homework, examinations, and extracurricular activities;
- in various other ways as you and your child interact with us during your time as part of the Foundation community, 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 students and parents (and 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 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 family details;
- your image and likeness, including as captured in photographs taken for school purposes;

- details of your education and references from your previous schools;
- lifestyle information and social circumstances;
- your interests and extra-curricular activities;

5.3 Financial information, including:

- your bank account number(s), name(s) and sort code(s) (used for paying school fees and processing other payments);
- your tax status (including residence status);
- information related to bursaries, scholarships, or other financial assistance;

5.4 Academic and extracurricular information, including:

- your academic records, including internal and external test and examination results;
- behavioural records;
- safeguarding records;
- information about your attendance;
- your personal data captured in the work you create, notes and reports created while you are at the Foundation;
- details of your activities, including participation in sports, music, drama and other extra-curricular pursuits;

5.5 Medical and welfare information, including:

- information concerning your health and medical conditions (for example, allergies or injuries);
- dietary requirements;
- special educational needs;
- counselling records;

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

- information revealing your racial or ethnic origin;
- religious or similar beliefs;
- biometric information, for example where necessary for school security or catering systems;
- information concerning your health and medical conditions;
- information about certain special educational needs.

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.

- 6.2 processing applications and managing the admissions process;
- 6.3 for the performance of the contract (or other agreement) between you and us;
- 6.4 providing educational services, including teaching, assessment, and extra-curricular activities;
- 6.5 maintaining pupil records and generating progress reports;
- 6.6 administering fees and payments, including processing of scholarships or bursaries;
- 6.7 maintaining payment records and processing financial transactions;
- 6.8 providing updates on billing and financial support;
- 6.9 preventing and detecting fraud against the Foundation;
- 6.10 organising school trips and extra-curricular activities;
- 6.11 communicating with parents/guardians about pupil progress and school matters;
- 6.12 providing pastoral care and support services;
- 6.13 monitoring your use of our IT systems to ensure compliance with our policies (including the Foundation's IT Acceptable Use Policy);
- 6.14 for other administrative purposes, for example to update you about changes to your terms and conditions;
- 6.15 for any other reason or purpose set out in your contract with us.

6.16 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. In this respect, we are likely to use your personal data for the following:

- safeguarding and promoting student welfare;
- ensuring the security and safety of the school community, 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;
- for the purposes of management planning and forecasting, research and statistical analysis, including financial planning and budgeting;
- to ensure the financial stability and sustainability of the Foundation;
- monitoring and improving our educational services and outcomes;
- facilitating efficient communication between school and home;
- promoting the Foundation and its activities to prospective families;
- maintaining relationships with alumni and the school community;
- using photographs and videos of students for educational purposes and to showcase school life;
- 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;

6.17 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:

- complying with education law and regulations;
- fulfilling our safeguarding and child protection duties;
- ensuring health and safety requirements are met;
- reporting to government agencies and educational authorities as required;
- complying with any other statutory data collection requirements;

6.18 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:

- student physical or mental health information to ensure their safety and provide appropriate care;
- information about special educational needs and disabilities to provide appropriate support and accommodations;
- racial or ethnic origin data for diversity monitoring and to ensure equal opportunities;
- religious beliefs to respect and accommodate students' faith practices;
- biometric data for security or catering systems, where applicable and with appropriate safeguards;

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 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).

10.1 Students in Year 7 and Above

Once pupils enter Year 7, they are generally assumed to have sufficient maturity to understand and exercise their data protection rights, with parents no longer being able to exercise their children's rights for them.

For example, this means that students in Year 7 and above can make subject access requests for their own personal data and provide or withdraw consent for certain types of data processing where consent is used as the legal basis. If a parent of a child in Year 7 or above makes a Subject Access Request (as an example) on their behalf, it will be declined. We may seek dual consent, from parents and students, where the risk is considered to be high enough that a parent or guardian should provide guidance to their child/ren - for example we do this when publishing images of child/ren for marketing purposes if we show them in an identifiable way.

Parents will generally continue to receive educational and pastoral updates about their children, but the student's consent may be sought for specific processing activities where appropriate.

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.