

Privacy Notice – Children and Educational Visits

1. Who we are

Data Controller:

The data controller responsible for the educational activity, visit or event will be the relevant Lulworth Estate company organising or providing the activity.

References in this notice to The Lulworth Estate refer collectively to the Lulworth Estate group of companies and associated entities.

Data Protection Contact:

The Lulworth Estate has not appointed a statutory Data Protection Officer. Data protection matters are managed through our Data Protection Contact at gdpr@lulworth.com

Email: gdpr@lulworth.com

If you have any questions regarding the processing of your personal data or wish to exercise your rights, please contact us using the above email address.

If you believe your personal data has been compromised or misused please contact us immediately using the details above.

Responsible Owner: Education Lead

2. Purpose of this notice

This notice explains how the Lulworth Estate collects, uses, stores and protects personal data relating to children and others participating in educational activities, school visits, events and related programmes, together with information relating to parents, guardians and educational establishments.

3. What personal data we collect

We may collect:

- Name and school details
- Parent or guardian contact details
- Emergency contact details
- Attendance records

- Activity participation records
- Dietary requirements
- Allergy information
- Consent records where required
- Records relating to parental authority or permissions
- Photographs and videos (where applicable and authorised)
- Incident and safeguarding records
- Medical treatment information provided during an activity
- Information provided to support accessibility requirements or additional support needs.
- School year/group information
- Behavioural information

4. CCTV Processing

We may process CCTV footage for security, health and safety, crime prevention, investigation of incidents, protection of company assets and safeguarding both employees and visitors.

5. How we collect your data

We may collect personal data from:

- Parents or guardians
 - Schools, colleges or other educational establishments
 - Group organisers
 - Booking or registration forms
 - Consent forms
 - Incident and safeguarding reports
 - Emergency services or medical professionals where necessary
-

6. Why we use your data (lawful basis)

Purpose	Lawful Basis
Delivering educational activities and administering attendance	Performance of contract / Legitimate interests
Safeguarding and care	Legal obligation
Health and safety	Legal obligation
Evaluating services	Legitimate interests

7. Our legitimate interests

Where we rely on legitimate interests, these include:

- Delivering educational activities
 - Managing bookings and attendance
 - Ensuring health and safety
 - Protecting children and vulnerable individuals
 - Communicating with schools, parents and guardians
 - Planning and administering education programmes.
 - Improving educational services
 - Investigating complaints and concerns
 - Managing complaints and incidents
 - Protecting Estate assets
 - Legal compliance and risk management
-

8. Safeguarding

The Lulworth Estate is committed to safeguarding children and young people. Personal data may be processed where necessary to protect children, investigate safeguarding concerns, respond to incidents, comply with legal obligations and cooperate with schools, local authorities, regulators or emergency services.

Where safeguarding concerns arise, personal data may be shared with appropriate safeguarding authorities, local authorities, the police, schools, social care services or other relevant organisations where necessary to protect a child or comply with legal obligations.

The welfare and protection of children will always be the primary consideration in such circumstances.

9. Special category data

We process special category personal data including health information, allergy information, dietary requirement, accessibility requirements, safeguarding information and information relating to incidents where this is necessary for the safety and wellbeing of children and young people.

Such processing is undertaken under one or more of the following conditions:

- Article 9(2)(b): Employment, social security and social protection law obligations
- Article 9(2)(c): Protection of vital interests of a child or another individual
- Article 9(2)(f): Establishment, exercise or defence of legal claims

- Article 9(2)(g): Substantial public interest, including safeguarding of children and individuals at risk in accordance with Schedule 1 of the Data Protection Act 2018

Processing is limited to what is necessary and proportionate.

10. Who we share your data with

We may share data with:

- Schools and group organisers
 - Parents and guardians
 - Emergency services
 - Approved activity providers
 - Transportation providers where required for organised activities
 - Local authorities
 - Safeguarding bodies
 - Regulators
 - Insurers
 - Legal advisors
 - Medical professionals where necessary
 - Occupational health professionals where necessary
 - Service providers supporting booking or activity administration
-

11. International transfers

We do not routinely transfer data outside the UK. Where suppliers process data outside the UK, we ensure appropriate safeguards are in place, including adequacy regulations, the UK International Data Transfer Agreement (IDTA), or other approved transfer mechanisms.

12. How we protect your data

We use appropriate technical and organisational measures, including:

- Restricted access (role-based permissions)
- Enhanced access controls for safeguarding and child protection records.
- Secure IT systems and password protection
- Locked storage for paper records
- Staff training on data protection
- Secure document retention and destruction procedures
- Audit logging where appropriate
- Safeguarding procedures

13. How long we keep your data

Retention periods may be extended where required by safeguarding guidance, statutory obligations, legal proceedings, insurance requirements or the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Activity bookings	Duration of activity plus administrative period
Attendance records	Up to 3 years
Safeguarding records	In accordance with safeguarding requirements
Incident records	Until the individual reaches age 21 or longer where safeguarding, insurance or legal requirements dictate.
Hazard exposure records	Up to 40 years
Photographs and media	In accordance with consent and retention requirements
CCTV footage	Typically, 30–90 days unless required for investigation

14. Is providing your data mandatory?

Certain personal data is required in order to allow participation in educational activities, management of health and safety requirements and fulfil safeguarding responsibilities.

Failure to provide required information may prevent participation in some or all activities where we cannot safely or lawfully deliver the activity.

15. Your rights

Parents/guardians (or children where applicable) have full rights under UK GDPR.

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Rights regarding automated decision-making

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing undertaken before consent was withdrawn.

Depending upon the age and understanding of the child, requests regarding data protection rights may be made by the child, their parent or guardian, or another person authorised to act on their behalf.

Requests relating to your data protection rights should be directed to: GDPR@lulworth.com

16. Complaints

You have the right to complain to the ICO:

- Website: www.ico.org.uk
 - Helpline: 0303 123 1113
-

17. Automated decision-making

We do not make decisions relating to children based solely on automated processing. Any decisions affecting participation, safety or safeguarding are subject to appropriate human review.

18. Changes to this notice

This notice may be updated periodically to reflect changes in legislation, safeguarding requirements, educational activities, service providers or business operations.

19. Document control

- Version: 2.0
- Owner: Education Lead
- Review Cycle: Annual