

Privacy Notice – Organised Trips & Experiences (including overseas)

1. Introduction and purpose

This Privacy Notice is for individuals whose data is processed by LTE Group in relation to organised trips and experiences.

This Notice provides information that is in addition to information contained in our <u>Colleague and student</u> <u>privacy notices</u> and <u>Data Protection Policy</u>. Please do read these documents to understand our practices and if you have any questions, please contact us using the details provided below.

2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data collected will be classed as being 'special category personal data'*. Access to and sharing of this information is controlled very carefully.

The categories of personal information that we may collect, store, and use about you may include:

	Student/ Learner	Colleague	Parent/ NOK
Name	✓	✓	~
Contact Details	~	~	✓
Funding Information	~	~	
Insurance details	✓	~	
Next of kin details	✓	✓	
Country of Birth and Passport information	✓	~	
Health and physical information, any disability and/or medical condition, vaccination/allergy information/dietary requirements or learning needs*	~	~	
Experience and suitability	~	~	
Bursary information	~		
Reference information	~		
Incident logging	~	~	
Photographs/videography	✓	✓	
Feedback regarding the trip/experience	~	✓	,

We may need to collect further personal data directly from you as part of the trip application/the course of the trip.

3. How is your personal information collected?

Student information is typically collected through our application process, such as the 'expression of interest' initial stage and interview stage. Colleague information is collected via the initial expression of interest stage.

4. How will we use information about you?

The information we collect will allow us to arrange trips and experiences for student participants and accompanying colleagues.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing. Where we process special category personal data we are required to establish an additional lawful basis for processing that data.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.















Purpose	Lawful Basis
To assess your suitability for the trip/experience	To comply with our legal obligations Where it is in a person's vital interests.
trip/experience	Where it is in a person's vital interests
To deliver the trip/experience	Where it is in our/your legitimate interests
· · ·	To accomplish the contract of the contract of
Equal opportunities monitoring	To comply with our legal obligations
To administer, or otherwise deliver,	Necessary for the performance of a contract
our obligations arising from	Performance of a task in the public interest (education)
experience/trip participation	To comply with our legal obligations, e.g. in respect of
	health and safety or equality law and safeguarding
	Where it is in a person's vital interests
To record progress and incidents	Where it is in a person's vital interests
during the trip	To comply with our legal obligations
Internal and statutory reporting, audit	To comply with our legal obligations, e.g. health and
& other legal obligations, including	safety law
compliance with health and safety law	Performance of a task in the public interest (education)
Photography/videography for	Where it is in our/your legitimate interests
promotional/marketing purposes	In certain circumstances we will also obtain your
	consent for processing your data in this way
Feedback regarding the	Performance of a task in the public interest
trip/experience/ Research and	Where it is in our/your legitimate interests
planning purposes	

Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another lawful basis, as outlined in the table above). If we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

5. If you fail to provide personal information

If you fail to provide certain information when requested, you may not be able to participate in our trips/experiences.

6. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means, however, we will notify you in writing if this position changes.

8. Data sharing

We will need to share your personal data with external parties; some of whom are essential for complying with our legal and contractual obligations, for example:

- Experience provider partners
- Parents/next-of-kin representatives
- Regulatory or funding bodies (for example, the DfE)

A full register of who we may share your personal data with and why is available on request: dpo@ltegroup.co.uk

Information on how we handle disclosure requests, for example for law enforcement, crime prevention and investigation purposes, can be found here: <u>LTE Group and Disclosure requests</u>

All parties who we share data with are required to take appropriate security measures to protect your personal information, in line with our policies. We do not allow our third-party service providers/data processors to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your data may be transferred outside of the UK, for example, where we use third party providers to deliver our services, such as externally hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

9. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, subject to any statutory obligations.

Full details of retention periods are available in our in our **Records Management Policy** and **Data Retention Schedule** (available on request from dpo@ltegroup.co.uk).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our data retention policy and applicable laws and regulations.

10. Your individual rights in connection with personal data

Subject to certain conditions, you have the following rights in relation to your personal data:

Access to your personal information (known as the Right of Access/a Subject Access Request)

Rectification of the personal information we hold about you if it is inaccurate

Erasure of your personal information (in certain circumstances)

Restriction of processing of your personal information

To be **Informed** about the processing your personal information

Transfer of your personal information to another party

Objection to processing of your personal information

Suspension of processing of your personal information

If you wish to invoke any of the above rights, please contact us via email: dpo@ltegroup.co.uk or colleagues can raise a ticket via the ColleagueSelf-ServicePortal.

Further guidance on your rights is available from the Information Commissioner's Office (https://ico.org.uk/).

11. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

LTE Group Data Protection Officer Whitworth House Ashton Old Road Manchester

Further information is available on the ICO website, or via telephone:

dpo@ltegroup.co.uk

M11 2WH

https://ico.org.uk/global/contact-us/ 0303 123 1113

More information on the ICO's complaint procedure can be accessed at: https://ico.org.uk/make-a-complaint/

If you do not wish to discuss your complaint with us, or you are unhappy

with our response, you also have the right to lodge a complaint with a

supervisory authority, the Information Commissioner's Office (ICO).