



LADY HEYES LIMITED / WEBSITE POLICY PACK

Ten policies. One safer, clearer holiday park.

Safeguarding, respectful conduct, privacy and recruitment guidance policy framework for Lady Heyes Holiday Park.

DOCUMENT OWNER & CONTACT

Dan Ferguson | Site Manager | enquiries@ladyheyespark.com

PREPARED	14 October 2026
ORGANISATION	Lady Heyes Limited (company 08811174)
STATUS	Management approved - independent compliance not certified
PUBLISHING	Approved for publication at www.ladyheyespark.com

These management-approved policies set out intended standards. Their approval does not independently certify that all legal or operational requirements are met. Site procedures, notices, retention and supplier settings must be verified for implementation before website publication.



POLICY INDEX

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Where to report a concern

Immediate danger or a crime in progress: 999. Non-emergency police: 101. General contact: Dan Ferguson, Site Manager, enquiries@ladyheyespark.com; 01928 788557 (office normally 08:00-20:00). Children's and adult safeguarding referral information is given in Policy 2.

External welfare referrals must not wait for the next office shift if the matter is urgent.



POLICY 01 OF 10 / OUR COMMITMENT

Safeguarding Policy Statement

A clear commitment to the wellbeing of children and adults who may be at risk while visiting Lady Heyes Holiday Park.

Our commitment

Lady Heyes Limited, trading as Lady Heyes Holiday Park, is committed to providing a welcoming and reasonably safe environment for visitors, including children, families, older guests and adults who may be at risk. We take welfare concerns seriously and will act promptly where there is a reasonable concern about abuse, neglect, exploitation, harassment or immediate danger.

We recognise that safeguarding is everyone's responsibility. Our role as a holiday-park operator is to observe, respond appropriately and report concerns to the right people and agencies. We do not provide a substitute for statutory safeguarding services or a childcare service merely because families are staying on site.

Who this covers

This statement applies to our employees, managers, temporary staff, agency workers and contractors while engaged on Lady Heyes Limited business, and informs the standards expected of guests and visitors. Independent businesses operating within the Attraction Village and other on-site venues are responsible for their own employees and activities; we expect cooperation on safety concerns affecting the shared site.

Our standards

- Treat everyone with dignity and respect and take concerns seriously.
- Prioritise immediate safety; call 999 if a person faces immediate danger or a serious crime is occurring.
- Listen carefully to someone who raises a concern without promising secrecy or conducting our own investigation.
- Pass concerns without delay to the Site Manager, or directly to children's/adult social care or the police when appropriate.
- Use information only with those who need it to help protect someone; keep factual records securely.
- Maintain sensible boundaries with children and adults at risk and do not leave children in staff care unless a separately authorised service expressly provides such supervision.
- Explain that parents, guardians and carers remain responsible for the supervision and care of children in their party, subject to any specifically advertised supervised activity.

Accountability and reporting

Primary contact: Dan Ferguson, Site Manager, Lady Heyes Holiday Park, enquiries@ladyheyespark.com; reception 01928 788557 (office generally 08:00-20:00). Outside office hours guests can contact the duty/warden arrangements on site where available. Do not wait for a manager or email reply where urgent external action is needed.

This statement should be read alongside Policy 2 (Safeguarding Procedures), Policy 3 (Anti-Bullying), Policy 5 (Online Safety) and Policy 6 (Changing Facilities). It is reviewed at least annually and after any serious safeguarding incident or material change.



POLICY 02 OF 10 / PRACTICAL RESPONSE

Safeguarding Policy & Procedures

How concerns are recognised, recorded and escalated across touring, camping, glamping, accommodation, communal areas and the wider site.

1. Roles and boundaries

The Site Manager (Dan Ferguson) coordinates the park's safeguarding response and recordkeeping, but any employee who believes a child or adult is at immediate risk must seek urgent help without waiting for permission. Staff have a duty to report concerns promptly and must not conceal them.

Accommodation and facilities are offered for leisure stays. Adult supervision of children remains the responsibility of parents and guardians. Where an independent on-site business organises an activity, its own safeguarding and supervision arrangements must be clarified with that operator.

2. Recognising a concern

Concerns can arise from something witnessed, a direct disclosure or repeated signs of risk. Examples include suspected physical or sexual abuse, neglect, exploitation, domestic abuse, coercive or controlling behaviour, a missing or unattended child, severe bullying, inappropriate staff conduct, unsafe adult/child boundaries, misuse of photography or communication, or abuse involving an adult with care and support needs.

A concern need not be proven before it is shared with the relevant professional service. Staff should act on reasonable concerns and avoid assuming that an apparently private family matter cannot be a safeguarding issue.

3. What to do immediately

- If somebody is in immediate danger, there is an emergency, serious injury or an ongoing crime: call 999. Give your exact location on site and follow police or ambulance instructions.
- If safe, take proportionate action to prevent immediate harm, such as summoning a duty manager, separating people without physical confrontation or securing access to a hazardous area.
- Do not put yourself or others at risk, make allegations in public, search devices, seize phones or conduct investigative interviews.
- Where safe and appropriate, preserve relevant CCTV or incident records and avoid deleting messages or images.

4. If someone tells you something

Listen calmly, allow the person to speak in their own words and reassure them they did the right thing in telling you. Explain that information may have to be shared to keep people safe. Do not promise confidentiality, ask leading questions, judge their account or approach the alleged perpetrator. Record the date, time, location, who was present and the person's words as accurately as possible.

Explain what will happen next. Offer appropriate practical support but do not promise a particular legal or disciplinary outcome.



5. Referrals - children

Cheshire West and Chester Integrated Access and Referral Team (iART): 0300 123 7047 during published office hours. For urgent concerns outside those hours, the Emergency Duty Team: 01244 977277. For non-emergency suspected crime, contact Cheshire Police on 101; use 999 in an emergency.

Staff members and professionals should follow the council's current professional referral procedure, including any requirement to telephone iART before sending referral information. If a referral appears necessary, do not wait for the next office shift.

6. Referrals - adults

Adult safeguarding under the Care Act may apply to an adult with care and support needs who is experiencing or at risk of abuse or neglect and, because of those needs, cannot protect themselves. Where this may apply, use Cheshire West and Chester Council's online adult safeguarding referral route; the Community Access Team can be reached on 0300 123 7034 during its published hours, and the Emergency Duty Team on 01244 977277 outside those hours.

Respect the adult's wishes and autonomy where possible, while recognising that serious risks, coercion, capacity concerns or risks to others can justify escalation. Record the reasons for any information sharing.

7. Reporting an allegation about staff or contractors

Any allegation that a Lady Heyes worker or contractor has harmed or poses a risk to a child or adult must be reported promptly to the Site Manager unless the allegation involves him; in that event, report directly to a company director or the relevant statutory agency. Where children are involved, the manager must obtain advice from the appropriate local authority safeguarding service and follow any applicable Local Authority Designated Officer (LADO) process. Staff should not attempt internal fact-finding that could compromise a statutory inquiry.

Any necessary work restrictions will be proportionate and documented pending advice. No one should be treated as guilty merely because a concern has been raised.

8. Specific holiday-park situations

- Missing or unattended child: notify reception/duty manager immediately, check known last location, take steps consistent with the emergency response plan and call 999 without delay if there is an urgent risk. Do not publish identifying details on social media.
- Hot tubs, play and communal areas: follow posted safety rules, age/height requirements and parental supervision rules; report unsafe behaviour, suspected injury and neglect immediately. Hot-tub water safety also requires a separate documented technical programme.
- Guest accommodation: if there is suspected domestic abuse or violence, prioritise safety, avoid confronting the alleged abuser and contact police or safeguarding services as appropriate.
- Shared bathrooms and changing: preserve privacy, respond sensitively to reports of harassment, voyeurism or inappropriate contact, and follow Policy 6.
- Independent businesses: the park will cooperate with independent operators and emergency agencies on issues affecting shared areas, while respecting each operator's own safeguarding responsibilities.

9. Records, confidentiality and follow-up

Make a factual record as soon as possible: what happened, witnesses, action taken, when, external agencies contacted and any reference numbers. Label clearly whether a statement is observed fact or reported allegation. Store safeguarding files in access-restricted systems; do not leave them in ordinary guest notes or unrestricted chat threads.



Only disclose information to those who need it for a lawful safeguarding purpose. Data protection law does not prevent proportionate, necessary sharing to protect people. The manager should ensure appropriate follow-up, support for those involved, safe preservation of evidence and review of lessons learned.

10. Training, oversight and external contacts

All relevant staff should receive role-appropriate safeguarding awareness, clear reporting instructions and refreshers when needed. Managers should review recorded concerns for patterns and ensure staff know that external reporting is possible even when a manager is unavailable or implicated.

Key contacts: Emergency services 999; Cheshire Police non-emergency 101; children's iART 0300 123 7047; adult Community Access Team 0300 123 7034; out-of-hours Emergency Duty Team 01244 977277; Lady Heyes Site Manager Dan Ferguson via enquiries@ladyheyespark.com and reception 01928 788557.



POLICY 03 OF 10 / RESPECTFUL ENVIRONMENT

Anti-Bullying Policy

Preventing and responding to intimidation, harassment and repeated unkind behaviour between visitors, employees and other site users.

Policy position

Bullying, intimidation, threats, discriminatory abuse, harassment or targeted humiliation are not acceptable at Lady Heyes Holiday Park. Behaviour may be face to face or online, and may involve guests, children, staff, contractors or users of shared facilities. The park also recognises that single serious incidents can require action even when bullying is not repeated.

Examples of unacceptable behaviour

- Repeated name-calling, mocking, exclusion or deliberately upsetting someone.
- Threatening gestures, aggressive confrontations, unwanted contact or attempts to frighten.
- Humiliation connected to disability, race, religion, sex, age, sexual orientation, gender reassignment or other protected characteristics.
- Cyberbullying, posting photos without permission, abusive social posts and threatening private messages.
- Bullying involving children or adults who are at risk, including when an adult fails to take concerns seriously.

Raising a concern

A guest or visitor can raise a concern with reception or email Dan Ferguson, Site Manager, at enquiries@ladyheyespark.com. Staff should report to the manager; where the manager is implicated, concerns may be raised with a company director or an appropriate external agency. If there is immediate danger, contact 999. Staff should act promptly where vulnerable people may be affected.

Response and fair process

The park will listen to those affected, make a proportionate safety assessment, document key facts and consider speaking separately to those involved. A manager may put temporary practical measures in place while matters are reviewed. Where a child or adult may be at risk, the safeguarding procedures take precedence and external referral may be necessary.

Any outcome will depend on seriousness, reliable evidence, safety and contractual or legal rights. Appropriate steps may include clear warnings, separation, restriction of access, removal from an activity, a staff disciplinary process or contacting police. We will not promise absolute confidentiality but will limit disclosure.

Prevention and review

We expect respectful conduct during quiet hours, at play areas, in communal facilities, in the café and Attraction Village, and in online communications connected with the park. We will review patterns of incidents to improve training, communication and site rules. Concerns are not dismissed simply because people are on holiday.



POLICY 04 OF 10 / EVERYONE WELCOME

Equity, Diversity & Inclusion Policy

Fair, accessible and respectful treatment in accommodation, customer service, work and shared spaces.

Principle and scope

Lady Heyes Limited aims to provide an inclusive and respectful environment for employees, contractors and guests. We will not unlawfully discriminate, harass or victimise people in the provision of services or employment, and will have due regard to the Equality Act 2010 and other applicable requirements.

We welcome guests with different needs and backgrounds. The park contains varied accommodation types and facilities, some of which have physical or operational limitations. Accurate accessibility information is important so that visitors can make informed decisions.

Respect and non-discrimination

- Treat everyone fairly regardless of disability, race, colour, nationality, sex, sexual orientation, age, religion or belief, pregnancy/maternity, marital or civil-partnership status or gender reassignment, recognising that particular protections differ by context.
- Do not use discriminatory or derogatory language or tolerate harassment or retaliatory behaviour.
- Explain accommodation and site rules consistently, including any designated adult-only or dog-friendly accommodation, and review them for their legal and practical appropriateness.
- Respect lawful assistance-dog rights and consider requests for reasonable adjustments on their individual facts; ordinary pet rules should not automatically be treated as decisive for assistance dogs.

Accessibility and reasonable adjustments

Guests are encouraged to contact enquiries@ladyheyespark.com before arrival if they need accessibility information or have a specific adjustment request. Staff should discuss individual needs sensitively and consider practical changes where reasonable: communication formats, reception arrangements, routes, assistance in accessing services or alternative suitable accommodation where available.

An adjustment is not guaranteed where it is unsafe, physically impossible or unreasonable, but requests must receive a genuine individual assessment rather than a blanket refusal. Staff should not seek irrelevant medical details and should record only necessary information securely.

Independent on-site businesses and events

The Attraction Village and certain leisure or hospitality services are operated independently. Each operator remains responsible for legal duties concerning its own service; we will provide contact directions, coordinate on shared-site access where possible and avoid making unverified claims about accessibility or facilities owned by others.

Concerns and improvement

Discrimination or accessibility complaints can be raised with Dan Ferguson, Site Manager, via enquiries@ladyheyespark.com. The concern will be considered objectively and without retaliation. We will review trends, work with staff and make proportionate improvements. This policy does not limit any statutory rights or independent complaint routes.



POLICY 05 OF 10 / DIGITAL CONDUCT

Online Safety & Communication Policy

Safe use of websites, booking systems, Wi-Fi, live chat, email and social media by the park and its visitors.

Where this applies

This policy covers digital communications handled by Lady Heyes Limited, including website enquiries, guest emails, online bookings, staff devices, Wi-Fi access, live chat and official social media accounts. Independent on-site businesses and third-party platforms retain responsibility for their own systems.

Guest and child online safety

Parents and guardians are responsible for supervising children's internet and device use. Public or guest Wi-Fi should not be assumed to provide parental controls or to be appropriate for sharing confidential information on an unsecured connection. Visitors should use age-appropriate services and report online grooming, threats, exploitative content or serious harassment to relevant authorities.

For immediate danger call 999; suspected child exploitation may be reported to police or relevant child protection services. A staff member who receives an online safeguarding concern must follow Policy 2 promptly.

Staff communication standards

- Use approved business accounts and systems for guest communication; avoid personal messaging accounts for business enquiries.
- Verify the identity and authority of anyone requesting a booking amendment, payment or private booking information.
- Never request unnecessary personal details, payment-card security codes or sensitive information through public chat.
- Use professional and respectful language; do not share internal incident details in public comments or social media.
- Do not initiate informal one-to-one personal conversations with children encountered through the park. If a child raises a concern, keep the response appropriate, record it in an approved system and escalate where necessary.
- Report suspicious links, impersonation, potential account compromise or a data breach promptly to management.

Live chat, bookings and third-party services

The website may use third-party tools for guest bookings, live chat, cookies, payments, Wi-Fi and analytics. Their involvement must be described transparently in the Privacy Policy and, where applicable, cookie information. Only authorised staff should access systems; use individual login credentials and appropriate account permissions.

Automated booking checks or scoring tools should be reviewed for fairness, transparency and applicable data-protection obligations. Staff should know how to refer a guest seeking an explanation or a human review to management.



Content, photography and incidents

Obtain appropriate permissions before publishing identifiable guests or children in promotional posts. See Policy 7. Do not forward or publicly post screenshots of private conversations. Preserve evidence of abusive online behaviour securely and notify the platform, police or safeguarding services where appropriate.

Monitoring and review

Managers will review the security and necessity of digital tools, staff access, relevant privacy notices and incident response arrangements. Operational cybersecurity procedures, booking verification and any guest Wi-Fi terms sit alongside this policy.



POLICY 06 OF 10 / PRIVACY & DIGNITY

Changing Facilities Policy

Respectful use of communal showers, toilets, washrooms and any changing or washing facilities on the holiday park.

Purpose

Lady Heyes Holiday Park provides shared washing and toilet facilities as well as accommodation with differing private facilities. We aim to keep these areas safe, clean, private and accessible as reasonably practicable. This is a public holiday-park environment, not a supervised school, leisure-club or childcare changing service.

Privacy and expected behaviour

- Respect occupied cubicles, doors, screens and privacy signage. Do not enter private or staff-only spaces without permission.
- Photography, video, livestreaming or any image capture in toilets, showers or changing areas is prohibited, except where specifically required by emergency responders or lawful authorised investigation.
- Harassment, sexual comments, exposure, voyeurism and intrusive behaviour must be reported immediately; serious incidents may be reported to police.
- Parents and carers must supervise children as appropriate to their age and needs. Do not leave children unattended on the assumption that staff will supervise them.
- Where an individual needs assistance from a carer, staff should respond sensitively and discuss a practical arrangement that respects privacy, dignity, accessibility and safety.

Cleaning, maintenance and access

Facilities are inspected and cleaned in accordance with operational schedules. Staff and contractors must use signage or temporary closure where cleaning or repairs could compromise privacy. Users should report broken locks, poor lighting, water hazards, unsafe fixtures or cleanliness issues promptly.

Individual needs, privacy and safety should guide practical decisions concerning access to facilities. We will consider reasonable adjustments within the constraints of the site.

Reporting concerns

Raise concerns with reception or Dan Ferguson at enquiries@ladyheyespark.com. If a child or adult is at risk, follow the Safeguarding Procedures immediately; if there is ongoing violence, a serious sexual offence or immediate danger, call 999.

Our hot-tub rules, accommodation instructions, accident procedures and risk assessments remain separate, additional requirements and are not replaced by this policy.



POLICY 07 OF 10 / IMAGES & CONSENT

Photography & Filming Policy

Respecting guests' privacy while allowing appropriate photography at a holiday destination and its events.

Scope

This policy applies to photos, video, live streaming, promotional content and recordings made by or on behalf of Lady Heyes Limited across the holiday park. It also explains standards requested of guests, creators and independent event partners. Photography in some public areas may occur, but people's privacy and safeguarding come first.

Staff and promotional content

Staff, contractors and invited influencers must have appropriate authorisation before recording guests for Lady Heyes promotional purposes. Where identifiable people are central to an image, the park should provide a clear explanation of intended use and rely on an appropriate lawful basis, including consent where required. Extra care and suitable parental or guardian permissions should be obtained for promotional images focusing on children.

Image consent should be documented where relied on, and withdrawal requests considered promptly. If an image has already been distributed or lawfully published, removal from all third-party locations may not be possible; we will assess what can reasonably be done.

Guests' personal photography

Guests may normally take personal holiday photographs provided they respect the privacy and safety of others. Guests must not film or photograph inside toilets, showers or changing facilities, peer into accommodation, harass other guests, or use footage for bullying, exploitation or unwanted publication.

Drones must not be flown on site without express written permission and compliance with applicable aviation, privacy and site rules; the park's standard guest rules prohibit them unless expressly authorised.

Children and safeguarding

Do not name or identify children in promotional posts without appropriate safeguarding and privacy review. Respect a parent or carer's expressed objection to filming their child. Photography involving suspicious conduct, exploitation or intrusion should be reported under the safeguarding procedures. Never publish an image to help identify a missing child without consulting police or appropriate authorities.

Events, third parties and storage

For organised events, provide advance notice where filming is planned and an appropriate contact for concerns. Independent Attraction Village businesses and external photographers are responsible for the images they collect, and should have suitable data protection arrangements. Where Lady Heyes commissions them, contracts should address usage, retention, security and rights.

Images used by Lady Heyes are stored with appropriate access controls and deleted when no longer needed under the data retention criteria in Policy 10. Requests to object, withdraw consent where relevant or seek removal can be sent to enquiries@ladyheyespark.com.



POLICY 08 OF 10 / ROLE-APPROPRIATE CHECKS

Safer Recruitment Policy

A practical recruitment standard for a mixed holiday-park workforce, without suggesting that every role requires a DBS check.

Recruitment principle

Lady Heyes Limited seeks suitable, reliable and respectful people for jobs across reception, housekeeping, grounds, maintenance, wardens, management and other services. Recruitment arrangements should be proportionate to the role, its risks and any relevant statutory duties. The holiday park is not, by reason of being a holiday park, a provider of regulated childcare or regulated care.

Selection and induction

- Prepare a clear role description and identify responsibility for guest contact, keys, personal data, access to accommodation and any potential contact with children or adults at risk.
- Make fair recruitment decisions against relevant job criteria; use suitable references and verify identity, right to work and qualifications where applicable.
- Use reasonable supervision and access control during induction, particularly in guest accommodation and areas requiring privacy.
- Explain conduct, incident escalation, safeguarding, equality, privacy, key control, lone working and confidentiality expectations as appropriate to the role.
- Reassess access and supervision if duties change materially or a concern is raised.

DBS checks - no blanket requirement

Lady Heyes does not represent that all employees undergo DBS checks, and this policy does not impose a blanket DBS-check requirement. The need for any criminal-record check is assessed for each job. A Basic DBS check may be considered where lawful and proportionate; a Standard, Enhanced or barred-list check will only be requested where the specific role meets the statutory eligibility criteria. Eligibility should be assessed against current Disclosure and Barring Service guidance before requesting the check.

Not every role involving occasional contact with families or children is eligible for an Enhanced DBS check. Staff must not assume that working on a holiday park automatically makes them eligible. Decisions should be recorded and reviewed if a role changes.

Contractors and independently operated businesses

Contractors working on behalf of Lady Heyes should be appropriately selected and managed for the work being performed, including access to guest accommodation and handling of keys or private information. Independent on-site businesses are responsible for their own recruitment and any checks legally appropriate to their activities; Lady Heyes may coordinate site access and safeguarding reporting expectations.

Concerns about suitability and review

Recruitment or conduct concerns should be referred to Dan Ferguson at enquiries@ladyheyespark.com. If a concern involves the Site Manager, it may be escalated to a company director or external agency. Allegations should be managed fairly, with safeguarding referrals where needed, and employee data retained securely for an appropriate period.



POLICY 09 OF 10 / SPEAK UP SAFELY

Whistleblowing Policy

A route for workers to raise serious wrongdoing affecting guests, staff, public safety or legal compliance.

What whistleblowing means

A worker may make a protected disclosure under the Employment Rights Act 1996 where they reasonably believe specified wrongdoing is occurring, has occurred or is likely to occur and the disclosure is in the public interest. Examples may include criminal offences, breaches of legal obligations, danger to health or safety, environmental damage or deliberate concealment of such matters.

An individual grievance, ordinary customer complaint or disagreement about a booking is not automatically a protected disclosure. Those issues may be dealt with through appropriate grievance or complaints arrangements, while still being treated seriously.

How to raise a concern

Workers are encouraged to provide as much factual information as they can, including dates, locations, relevant documents and why they are concerned. The normal internal contact is Dan Ferguson, Site Manager, enquiries@ladyheyespark.com. A report may also be made in person or in writing.

If the concern relates to Dan Ferguson or a worker is uncomfortable approaching him, they may write confidentially to a company director at Lady Heyes Limited, Lady Heyes Craft Village, Kingsley Road, Frodsham, Cheshire WA6 6SU, marked "Private and Confidential - Whistleblowing". An appropriate regulator or prescribed person may also be contacted in accordance with the law.

Our response

We aim to acknowledge concerns where contact details are available, assess immediate risk, preserve relevant information and arrange proportionate investigation by an impartial person. We will provide suitable feedback where legally possible. We cannot guarantee complete anonymity or a particular result, but will seek to protect confidentiality and avoid unnecessary disclosure.

Protection and emergencies

Workers who make a qualifying protected disclosure must not be subjected to unlawful detriment or dismissal because of it. Deliberately false allegations may be addressed through ordinary procedures, but an allegation that cannot be substantiated is not, by itself, misconduct.

Whistleblowing must never delay emergency action. Where somebody is in immediate danger, call 999. Safeguarding concerns should also be referred under Policy 2. No internal process should be presented as preventing a lawful report to police, children's/adult social care or an appropriate regulator.

Review

Management should review the policy and any significant trends in concerns annually, ensuring that training and internal channels remain accessible and staff know alternatives to reporting to the manager.



POLICY 10 OF 10 / YOUR PERSONAL DATA

Privacy Policy

How Lady Heyes Limited handles personal information when people visit, book accommodation, contact us and use the holiday park website.

1. Who we are

Lady Heyes Holiday Park is operated by Lady Heyes Limited (company number 08811174), registered office: Lady Heyes Craft Village, Kingsley Road, Frodsham, Cheshire WA6 6SU. Lady Heyes Limited is the data controller for personal information it collects for its own holiday-park services. Independent businesses on or near the site may be separate controllers for their own services.

Privacy contact: Dan Ferguson, Site Manager, enquiries@ladyheyespark.com; postal correspondence may be sent to the registered office above. Please do not include sensitive details in an initial email unless necessary.

2. Information we may collect

Depending on the service used, this may include names, contact information, booking and stay details, number and ages of guests where necessary for booking rules, car registration details, guest preferences, communications and complaints, invoice/payment transaction records, voucher information, electricity-use and pitch information, website/booking activity, and information about any accidents or safety incidents.

Where relevant, we may also collect limited accessibility or health-related information volunteered to arrange a suitable adjustment or respond to an incident; this is handled with additional safeguards and an appropriate lawful condition where required. Images from authorised photography or CCTV (where installed and signposted) may also be processed.

3. Why we process data and lawful bases

We may process personal data to administer bookings, take payment, provide accommodation and guest services, confirm eligibility under accommodation rules, communicate essential stay information, respond to enquiries, address maintenance and complaints, protect safety, prevent fraud, manage accounts and legal claims, meet legal/accounting obligations, and improve site services.

Depending on the purpose, our lawful basis may be performing a contract, complying with a legal obligation, our legitimate interests where appropriately balanced, protecting vital interests in urgent circumstances, or consent where specifically required (for example certain direct marketing or non-essential cookies). We will not assume that one lawful basis covers every purpose. Where special-category information is used, an additional Article 9 condition must also be identified where required.

4. Booking systems, payments and automated checks

We use or may use specialist third-party suppliers to administer online enquiries, bookings, payments and customer records. Payment providers may process card or account information directly under their own security arrangements. We do not routinely need full payment-card security details in website live chat.

Our booking process may use automated rules or trust/risk scoring to help identify bookings needing further review. Guests may be asked to provide additional information and some requests may be referred to staff for review. The operator should maintain appropriate transparency, test for unfair outcomes and assess whether any solely automated decisions require additional UK GDPR safeguards or notices. Please contact us if you seek an explanation of a particular booking decision.



5. Website, cookies, live chat and Wi-Fi

When you visit ladyheyespark.com, technical data such as IP address, device/browser type, page activity and cookie choices may be collected by website infrastructure and any activated website services. Essential technologies help the site operate and remember choices; non-essential cookies and similar technologies should be subject to a lawful consent or applicable exemption, with an accessible way to withdraw or change preferences.

Our website may use live chat, analytics or contact services provided by third parties, including HubSpot where enabled. Such services can store messages, contact details and chat history to allow replies. Guest Wi-Fi is provided through a separate supplier and may operate under its own terms and privacy information. The current website cookie notice should list the tools and categories actually in use; the website developer should confirm this by an up-to-date scan and audit before publication.

6. Who we share data with

Information may be shared when necessary with accommodation/booking system providers, payment processors, IT and hosting suppliers, live-chat/email providers, professional advisers, insurers, contractors involved in fulfilling our services, emergency services, police, local authorities or regulators where lawful. Access should be limited to what is necessary. Independent tenants, cafés, shops and padel or leisure operators on the site are generally responsible for information they collect for their own activities.

Some suppliers may process information outside the UK. When relevant, transfers must have a lawful transfer mechanism or adequacy arrangement and suitable protections. You may ask us for information about applicable safeguards.

7. Photographs, events and marketing

We may use photographs or video of park grounds and events for lawful communication and promotion. When identifiable individuals, particularly children, are featured, we assess the lawful basis and obtain appropriate permissions where required. Guests can raise image concerns using our privacy contact address.

Marketing emails or messages will be sent only where the law permits, including obtaining consent or meeting any applicable soft opt-in requirements. Individuals can unsubscribe or object to direct marketing at any time.

8. How long we retain information

We keep personal information only for as long as reasonably necessary for its original purpose, any related lawful purpose and relevant legal, regulatory, accounting, insurance or dispute-resolution obligations. Different categories of records have different retention rules: ordinary enquiries and chat histories are not necessarily kept for the same time as financial, accident or contractual records.

Where a fixed statutory retention period applies, we will follow it; where there is no prescribed period, we determine the period by necessity, risk, limitation periods and our documented retention schedule. Records will be reviewed and securely deleted, anonymised or archived with restricted access when no longer needed. The company must confirm its actual schedule and supplier settings before publishing any more specific figures.

9. Data security and children

We use proportionate organisational and technical safeguards, such as restricted staff access, appropriate supplier agreements, secure storage and incident-reporting procedures. No digital transmission can be guaranteed completely secure. Personal information about children is handled with particular care; parents/guardians should avoid sending unnecessary details about a child through live chat or public social media.



10. Your rights

Subject to applicable conditions and exemptions, individuals may request access to their personal data, correction, deletion, restriction, portability or object to certain processing. Where processing relies on consent, it can generally be withdrawn without affecting earlier lawful processing. Rights relating to automated decision-making may arise in particular circumstances.

To make a request, email enquiries@ladyheyespark.com and explain the request sufficiently for us to verify identity where appropriate. We aim to respond within the period required by law, subject to lawful extensions. Individuals also have the right to complain to the Information Commissioner's Office at ico.org.uk/make-a-complaint.

11. Updates to this notice

We may update this policy when our services, suppliers or legal duties change. Material changes will be made accessible on the website. The latest approved version and its effective date should be shown on the live page.



BEFORE WEBSITE PUBLICATION

Publication readiness checklist

The website developer can publish these policies once management has verified the factual and operational points below. The policies complement, but do not replace, site-specific fire, health and safety, hot-tub water safety, accident reporting, employment, complaints, data retention, booking and guest terms documents.

- ☐ Confirm Dan Ferguson is the designated primary recipient and establish reliable cover/alternate escalation where he is absent or the concern relates to him.
- ☐ Verify the site's existing safeguarding training, incident log, referral routes and staff instructions; brief the wardens and reception team.
- ☐ Confirm the appropriate child/adult safeguarding and allegations/LADO referral arrangements against current Cheshire West and Chester guidance.
- ☐ Verify each employee/contractor role assessment and explicitly avoid representing DBS checks as universal; document eligibility decisions only where checks are considered.
- ☐ Check accessibility descriptions, assistance-dog response and any adult-only accommodation conditions for actual practice and legal appropriateness.
- ☐ Confirm cleaning/privacy arrangements and facility access practices for shared showers, toilets and accommodation.
- ☐ Audit real website cookies, WordPress/Complianz, HubSpot, booking/payment/Wi-Fi suppliers, third-party links, consent banner and whether any tracking is set before consent.
- ☐ Approve the data retention schedule for each record category (bookings, finance, CCTV if used, complaints, safety, chat and staff records); confirm processor contracts and international transfer arrangements.
- ☐ Review booking trust-scoring/automated decision rules, human-review arrangements and the privacy disclosure for UK GDPR compliance.
- ☐ Confirm all photography consent arrangements and separate obligations of independent Attraction Village and Padel Club operators.
- ☐ Obtain qualified legal advice where appropriate and verify site-specific operational commitments; retain management approval records and document any outstanding implementation actions.

Approved: 14 October 2026 Signatory: _____ Next review: _____



REFERENCE MATERIAL

Authoritative guidance & resources

Selected sources checked on 14 October 2026. These links are supporting reference material for management review, not a substitute for professional legal advice or evidence that operational procedures are implemented.

Department for Education - Working together to safeguard children 2026

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Cheshire West and Chester - Report a concern about a child

<https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/children-and-young-people/report-a-concern-about-a-child>

Cheshire West and Chester - Report adult safeguarding concern

<https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/raising-adult-safeguarding-concerns/where-to-report-a-safeguarding-concern>

Disclosure and Barring Service - DBS eligibility guidance

<https://www.gov.uk/government/collections/dbs-eligibility-guidance>

ICO - What privacy information should we provide?

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/the-right-to-be-informed/what-privacy-information-should-we-provide/>

ICO - Cookies and similar technologies

<https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/cookies-and-similar-technologies/>

GOV.UK - Whistleblowing for employees

<https://www.gov.uk/whistleblowing/what-is-a-whistleblower>

HSE - Control of legionella and other infectious agents in spa-pool systems (HSG282)

<https://www.hse.gov.uk/pubns/books/hsg282.htm>

Companies House - Lady Heyes Limited (08811174)

<https://find-and-update.company-information.service.gov.uk/company/08811174>

Information Commissioner - Data protection complaints

<https://ico.org.uk/make-a-complaint/>

DOCUMENT END

Lady Heyes Holiday Park | Kingsley Road, Frodsham, Cheshire WA6 6SU | enquiries@ladyheyespark.com