

Safe Hands Out of School Club

Data Protection Policy

At Safe Hands we respect the privacy of the children attending the Club and the privacy of their parents or carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at Safe Hands can do so with confidence that their personal data is being kept secure.

Our lead person for data protection is C. Alberts. The lead person ensures that the Club meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

Confidentiality

Within the Club we respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to Club staff about their child will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our **Safeguarding Policy**).
- Concerns or evidence relating to a child's safety, will be kept in a confidential and will not be shared within the Club, except with those that need to know, typically the designated Child Protection Officer and the manager.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- All personal data is stored securely in a lockable cupboard / on a password protected computer / passcode-locked phone.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.

Information that we keep

The items of personal data that we keep about individuals are documented on our personal data matrix. The personal data matrix is reviewed annually to ensure that any new data types are included.

Children and parents: We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parents. Our legal condition for processing any health-related information about a child, is so that we can provide appropriate care to the child. Once a child leaves our care we retain only the data required by statutory legislation, insurance requirements and industry

best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely or returned to parents.

Staff: We keep information about employees in order to meet HMRC requirements, and to comply with all other areas of employment legislation. Our lawful basis for processing this data is to meet our legal obligations. Our legal condition for processing data relating to an employee's health is to meet the obligations of employment law. We retain the data after a member of staff has left our employment for the periods required by statutory legislation and industry best practice, then it is deleted or destroyed as necessary.

Sharing information with third parties

We will only share child information with outside agencies on a need-to-know basis and with consent from parents as given during iPal registration, this can be withdrawn at any time, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (eg Police, HMRC, etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Where we share relevant information where there are safeguarding concerns, we will do so in line with Government guidance 'Information Sharing Advice for Safeguarding Practitioners' (www.gov.uk)

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR.

Subject access requests

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.
- Staff and volunteers can ask to see any information that we keep about them.
- We will make the requested information available as soon as practicable, and will respond to the request within one month at the latest.
- If our information is found to be incorrect or out of date, we will update it promptly.
- Parents /carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care we have to keep some data for specific periods so won't be able to delete all data immediately.
- Staff and volunteers can ask us to delete their data, but this may mean that we can no longer employ them as we have a legal obligation to keep certain data. In addition, even after a staff member has left our employment we have to keep some data for specific periods so won't be able to delete all data immediately.
- If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.

This policy was adopted by: Safe Hands	Date: 6.8.25
To be reviewed: Annually	Signed: C. Alberts

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2025): Safeguarding and Welfare Requirements: Information and Record Keeping [3.92-3.95]*

Privacy Notice: How we use Child & Parent Information

This notice explains how Safe Hands collects, stores, and uses personal data. As an out-of-school provider, we are a "Data Controller" and are registered with the Information Commissioner's Office (ICO) Registration number: ZC095145

The iPAL Booking System provided by Complete Education Solutions (CES) complies with the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). CES is registered with the Information Commissioner's Office (ICO) as a Data Controller (Registration number: ZA788348)

1. The categories of information that we process include:

- **Personal identifiers and contacts:** Name, address, date of birth, and emergency contact details.
- **Attendance and Booking:** Sessions booked/attended and links to the child's main provider school.
- **Safeguarding information:** Court orders, professional involvement (Social Care), and internal concern logs.
- **Special Educational Needs & Disabilities (SEND):** Individual support plans and inclusion audits.
- **Medical and Health:** GP details, dental health, allergies, dietary requirements, and medication records (including permissions and administration logs).
- **Incident records:** Accident books and behavioral logs.

To access the full list of categories held digitally, please log into your iPal profile.

2. Why we collect and use child information

We use this data to:

- a) Provide safe, high-quality wraparound care.
- b) Ensure the health and well-being of children (e.g., managing allergies/medication).
- c) Meet our statutory duties under the **Early Years Foundation Stage (EYFS)** and **Ofsted Childcare Register**.
- d) Maintain emergency contact pathways.
- e) Comply with safeguarding and child protection legislation.

3. The lawful basis on which we use this information

Under the UK GDPR, we rely on the following lawful bases:

- **Legal Obligation:** To meet the requirements of the EYFS Statutory Framework and Childcare Act 2006.
- **Contract:** To fulfill our agreement with you to provide childcare services via iPal.
- **Vital Interests:** To protect a child's life in a medical emergency.

Special Category Data (Health/Medical/Ethnicity):

We process this under **Article 9 of the UK GDPR** (Conditions: *Health or Social Care* and *Public Interest in the area of public health*), ensuring we can safely manage medical needs and allergies.

4. Collecting child information

We collect data primarily via your **iPal registration** and through supplementary paper forms (such as medication permissions and individual risk assessments). While most information is mandatory to ensure the child's safety, we will inform you if certain data is voluntary.

5. Storing child data

We hold data securely using a "dual-system" approach:

- **Digital Records:** Held on the cloud-based **iPal (CES)** portal, which uses industry-standard encryption.
- **Paper Records:** (e.g., medication logs, accident books, and observations) are stored in a **locked cupboard** with restricted staff access.

Retention: In line with best practices for insurance and legal claims (Limitation Act 1980), all child-related records are retained for **25 years** from the child's date of birth.

6. Who we share child information with

We do not share information with anyone without consent unless the law requires us to. We routinely share information with:

- The child's **main provider school** (to ensure continuity of care/safeguarding).
- **Local Authority** (for funding or safeguarding audits).
- **Ofsted** (during inspections).
- **Emergency Services** (if required for medical treatment).

7. Requesting access to your personal data

Under UK GDPR, parents and children have the right to request access to the information we hold (a "Subject Access Request"). You also have the right to:

- **Rectification:** Ask us to change inaccurate or incomplete data.
- **Informed:** Be told how your data is being used (as per this notice).
- **Restriction:** Request that the processing of your data is restricted in certain circumstances.

To make a request, please contact: Claire Alberts Safe.hands@hotmail.com
