



# Data Protection Policy

**Active Stars – West Sussex**

## 1. Statement of Intent

Active Stars is committed to protecting the privacy and personal data of children, parents/carers, staff and volunteers.

We ensure that personal data is collected, stored, used and shared lawfully, fairly and securely, and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to all early years, wraparound care and holiday provision operated by Active Stars.

## 2. Data Protection Lead

The Data Protection Lead for Active Stars is **Charlotte Drury**.

The Data Protection Lead is responsible for:

- Overseeing compliance with data protection legislation
- Responding to subject access requests
- Liaising with statutory bodies where required
- Ensuring staff understand their data protection responsibilities

## 3. Confidentiality

Active Stars respects confidentiality in the following ways:

- Information is only shared with parents/carers about **their own child**
- Information provided by parents/carers about a child is not shared with third parties without consent, unless there is a safeguarding concern
- Safeguarding information is stored securely and accessed only by the Designated Safeguarding Lead (DSL) and manager

- Staff discuss individual children only for legitimate operational or safeguarding purposes
- Staff are informed of confidentiality requirements during induction
- Employment-related information is restricted to those responsible for staffing decisions

All staff, volunteers and students on placement are expected to maintain confidentiality at all times.

## **4. Information We Hold**

### **Children and Parents/Carers**

We hold only the information necessary to provide safe and effective childcare. This includes:

- Registration details
- Contact information
- Attendance records
- Medical and health information
- Permission to administer medication forms
- Accident and incident records
- Safeguarding records

Much of this information is stored securely via **online parent accounts** and internal systems.

Our lawful basis for processing this data is the performance of a contract with parents/carers and compliance with legal obligations. Health-related data is processed to ensure the safety and wellbeing of the child.

### **Staff and Volunteers**

We hold information necessary to meet employment, safeguarding and legal requirements, including:

- Identity and contact details
- DBS and suitability checks
- Training records
- Payroll and HMRC information

Health-related data is processed only where necessary to ensure fitness to work or to meet legal obligations.

## **5. Storage and Security of Data**

Active Stars takes appropriate measures to protect personal data, including:

- Password-protected systems
- Restricted staff access based on role
- Secure online booking and parent account platforms
- Passcode-protected mobile devices
- Secure storage of paper records

Only authorised staff have access to personal and sensitive data. Access is limited to what is necessary to perform their role.

Data is reviewed periodically to ensure it remains accurate and relevant.

## **6. Retention and Disposal**

Personal data is retained only for as long as required by:

- Statutory legislation
- Insurance requirements
- Safeguarding obligations
- Industry best practice

Once data is no longer required:

- Electronic records are securely deleted
- Paper records are shredded or disposed of securely

## **7. Sharing Information with Third Parties**

Information is shared only where necessary and on a need-to-know basis.

We may share information:

- With parental consent
- To protect a child from harm
- Where required by law
- With statutory agencies such as the police, local authority or HMRC

Where safeguarding concerns exist, information will be shared without consent where necessary, in line with **Information Sharing Advice for Safeguarding Practitioners**.

Any decision to share information without consent will be recorded clearly, including the reasons.

We also share limited information with trusted third-party providers (e.g. booking systems, payroll providers). These providers are required to comply with UK GDPR.

## **8. Subject Access Requests**

Parents/carers may request access to information held about their child or themselves.

Staff and volunteers may request access to information held about them.

Requests will be responded to **as soon as practicable and within one month**.

Where information is incorrect or outdated, it will be corrected promptly.

Requests for data deletion will be considered, but some data must be retained to meet legal, safeguarding or insurance requirements.

## **9. Breaches of Data Protection**

Any actual or suspected data breach must be reported immediately to the manager or Data Protection Lead.

Appropriate action will be taken, which may include notifying the Information Commissioner's Office (ICO) where required.

## **10. Complaints**

If an individual has concerns about how their personal data has been handled, they should raise this with the Data Protection Lead in the first instance.

If concerns are not resolved, individuals have the right to complain to the Information Commissioner's Office (ICO).

## **Linked Policies**

- Safeguarding Policy
- Online Safety & Acceptable Use Policy
- Staff Behaviour & Code of Conduct
- First Aid, Illness & Medication Policy

## **Policy Review & Governance**

This policy has been written in accordance with the Statutory Framework for the Early Years Foundation Stage (EYFS) (2025), the UK General Data Protection Regulation and the Data Protection Act 2018.

This policy applies to all early years, wraparound care and holiday provision operated by the provider.

**Reviewed:** February 2026

**Next review due:** February 2027

**Approved by:** Director / Registered Provider