

Cool Kidz Club



Data Protection Policy

COOL KIDZ CLUB BRYNFORD

DATA PROTECTION AND DATA PROCESSING POLICY

1. Legal Compliance

1.1 The Club will comply with:

- The **Data Protection Act 2018**, the **General Data Protection Regulation (GDPR)**, and any subsequent relevant legislation, ensuring that all personal data is handled in a fair, lawful, and transparent manner.
- Guidance and best practices outlined by the **Information Commissioner's Office (ICO)**, including those available on their website (www.ico.gov.uk).

2. Data Collection

2.1 The Club will collect and process personal data relating to staff, volunteers, visitors, parents, children, and any other individuals with whom we have contact, whether stored electronically or in paper files. All such data is subject to data protection laws.

2.2 Only relevant personal data will be collected, and data subjects will be informed about:

- The specific purpose for collecting their data.
- The legal basis for processing their data (e.g., consent, contractual obligation, legal obligation).
- Any third parties to whom their data may be disclosed.

3. Data Storage and Security

3.1 Personal data will be stored securely and protected from unauthorized access.

3.2 Electronic data will be secured using appropriate measures, including password protection, encryption, and secure access controls.

3.3 Workstations in administrative areas will be positioned to avoid unauthorized observation of screens.

3.4 Manual records will be stored in locked cabinets, and access will be restricted to authorized personnel only.

3.5 Particular care will be taken to ensure the security of sensitive personal data (e.g., health information, special educational needs, or criminal convictions).

4. Data Accuracy and Updates

4.1 The Club will regularly remind staff and parents to ensure that the personal data held is accurate and up to date.

4.2 If any inaccuracies are identified, they will be promptly corrected. If incorrect data has been disclosed to third parties, they will be notified of the correction.

5. Data Disclosures

5.1 Personal data will only be disclosed to third parties when:

- The data subject has given explicit consent, or
 - There is a legal basis for disclosure under data protection law (e.g., legal obligation, contract).
- 5.2 If a request to disclose personal data is received by telephone, the Club will verify the identity of the caller before disclosing any data. If necessary, the Club may call the requester back to ensure their identity.
- 5.3 For in-person requests, the Club will ensure the requester is entitled to receive the personal data, and if the person is unknown, proof of identity will be requested.
- 5.4 Requests for lists of names (e.g., for parties) from parents or children will be politely declined, as the consent of all data subjects (children) would be required. The Club will suggest alternative methods for gathering this information.
- 5.5 Personal data will not be published in newsletters, websites, or other media without the explicit consent of the data subject.
- 5.6 Routine consent-related matters will be incorporated into the Club's admission application form to reduce the frequency of consent requests.
- 5.7 Personal data will only be disclosed to law enforcement (e.g., Police Officers) if they provide a written request specifying the legitimate need for access to the data.
- 5.8 A record of all personal data disclosures will be maintained to ensure that recipients can be

informed if the data is later found to be inaccurate.

5.9 The Club will not disclose any personal data to recipients outside the UK unless specific safeguards, such as standard contractual clauses or other lawful mechanisms, are in place.

6. Subject Access Requests (SARs)

6.1 If the Club receives a written request from a data subject to access their personal data, this will be treated as a **Subject Access Request** under GDPR. The Club will respond to the request within 40 calendar days.

6.2 Informal requests for personal data will be handled where possible at a mutually convenient time, but if there is any disagreement over this, the requester will be asked to submit a formal written request. The Club will comply with its legal obligation to respond within the 40-day deadline.

7. Policies and Procedures

7.1 This policy will be included in the Club's **Policies and Procedures** and will be regularly reviewed to ensure ongoing compliance with applicable data protection laws.

8. Data Protection Notices

8.1 Data protection statements will be included in the Club's **admission application forms** and any other forms used to collect personal data, ensuring transparency about how the data will be used, stored, and shared.

About Cool Kidz Club

Cool Kidz Club is a **registered childcare setting** with **CIW (Care Inspectorate Wales)**. We operate as a **non-profit charity (No. 1188330)** and are governed by a **Voluntary Committee of Trustees**.