DATA PROTECTION POLICY

for

THE COLOUR CORNER LTD

At The Colour Corner we respect the privacy of the children attending the setting 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 The Colour Corner can do so with confidence that their personal data is being kept secure.

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

In accordance with the Data Protection Act 2018 any personal data collected and held by The Colour Corner will be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- the controller shall be responsible for, and be able to demonstrate compliance with the above principles relating to the processing of personal data

Personal Data of vulnerable groups (children)

Children need particular protection when collecting and processing their personal data because they may be less aware of the risks involved.

The Colour Corner complies with the data protection principles and only collects information about a child which is necessary to their safeguarding. In general, the majority of children attending the setting are under the age of 13 and so consent is required from whoever holds parental responsibility for the child.

The Colour Corner will:

- never use children's personal data for marketing or any other purpose
- comply with all the requirements of the GDPR, not just those specifically relating to children

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 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 file and will not be shared within the setting, except with 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 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

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, 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: **The Colour Corner Ltd.**	Date: **1/9/26**
To be reviewed: **1/9/27**	Signed: K. Blakey

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2023): Safeguarding and Welfare Requirements: Health [3.45-3.47]*