



Data Protection Policy

Just Play Sports

At Just Play Sports, we protect the privacy of children, parents/carers and staff. Everyone using or working at the Club should feel confident that their information is used lawfully, fairly and securely.

Our **Data Protection Lead** is **Jack Dillon**.

He is responsible for ensuring compliance with the UK GDPR and Data Protection Act 2018, liaising with statutory bodies when required, and responding to any data protection enquiries or subject access requests.

1. Confidentiality & Secure Processing

We maintain confidentiality in the following ways:

- Information about a child is only shared with their parent/carer unless sharing is required for **safeguarding, public protection, or legal obligation**.
- Information shared by parents with staff will not be passed to third parties without consent unless there is a safeguarding or legal requirement.
- Safeguarding concerns are recorded securely and shared only with the **Designated Safeguarding Lead**, the **Deputy DSL**, or relevant statutory agencies in line with our Safeguarding Policy.
- Staff discuss individual children only when necessary for planning, care or safety.
- Confidentiality expectations are covered during staff induction and revisited through ongoing training.
- Employment-related information is restricted to those involved in personnel management.
- Digital records are kept on secure, password-protected systems with limited access.

- Paper records (e.g., registration forms, incident reports) are stored in locked facilities.
 - Students and volunteers are required to follow this policy as part of their induction.
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2. What Information We Collect and Why

Children and Parents

We collect only the information required to provide safe, effective childcare. This may include:

- Registration and contact details
- Medical and dietary information
- SEN/disability information necessary to meet a child's needs
- Attendance records
- Accident/incident reports
- Behaviour or safeguarding information (where relevant)

Lawful basis for processing:

- **Contract** – to provide childcare services.
- **Vital Interests / Legal Obligation** – for health, safety and safeguarding information.
- **Public Task** (where working with schools or local authority referrals).
- **Consent** – for specific optional activities (e.g., photos for internal displays, where applicable).

Retention:

We retain information only for the statutory periods required under UK law, Ofsted guidance, and best practice. After these periods, information is securely destroyed or deleted.

Staff

We hold information on staff to meet legal, regulatory and contractual requirements, including:

- Contact and employment details
- DBS information and safer recruitment documentation
- Training and qualification records
- Payroll and HMRC data

- Accident/incident records
- Medical fitness declarations (where required by employment law)

Lawful basis:

- **Legal Obligation** – employment law, safeguarding, HMRC requirements
- **Contract** – employment contract
- **Legal Obligation/Public Interest** – DBS and safer recruitment checks
- **Vital Interests** – emergency health information (if applicable)

Retention:

Records are kept for the statutory periods required for employment, safeguarding, and financial regulation, then securely destroyed.

3. Ofsted & Statutory Information Requirements

To meet Ofsted expectations, we ensure:

- Safeguarding records are maintained in accordance with “Keeping Children Safe in Education” and Ofsted inspection requirements.
- We can evidence the secure handling, storage and timely retrieval of information.
- Records required under the Early Years Foundation Stage (EYFS) or Childcare Register are available to Ofsted on request.
- All staff understand the importance of data protection as part of safeguarding.
- Any data requested by Ofsted during inspection is shared lawfully, proportionately and securely.

4. Sharing Information with Third Parties

We only share information when:

- It is necessary to safeguard a child.
- We have parental consent (for non-statutory purposes).
- We are required to do so by law (e.g., police, social care, HMRC).
- It is required to fulfil our contract with parents (e.g., sharing essential information with schools when pick-ups or transitions are involved).

We share only accurate, relevant and proportionate information.

Any decision to share information *without* parental consent is recorded with clear reasoning.

5. Subject Access Requests (SARs)

Individuals have the right to access information we hold about them.

We will:

- Provide requested information within **one month** (unless an extension is justified by law).
- Correct inaccurate or outdated information promptly.
- Explain when certain records cannot be deleted due to statutory retention requirements.
- Provide information securely using appropriate methods.

If a parent, staff member or volunteer is dissatisfied with the handling of their data or SAR, they may raise a concern with the **Information Commissioner's Office (ICO)**.

6. Data Breach Procedure

In line with UK GDPR requirements:

- Any suspected data breach must be reported immediately to the Data Protection Lead.
 - We investigate breaches promptly and take action to reduce harm.
 - Where a breach poses a risk to individuals' rights and freedoms, the ICO will be notified within **72 hours**.
 - Where required, affected individuals will be informed without undue delay.
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7. Compliance with UK GDPR and Data Protection Act 2018

We comply with the principles of:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation

- Integrity and confidentiality
- Accountability

Policy Written: 19th August 2026

Reviewed: 19th August 2027

Name: Jack Dillon

Position: Director

Signed: *Jack Dillon*