



# 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.

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## 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.

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### 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.

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### 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.
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### 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.

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## 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)**.

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## 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
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Policy Written: 28th November 2025

Reviewed: 28th November 2026

Name: Jack Dillon

Position: Director

Signed: *Jack Dillon*