



# Safe Hands Afterschool Club

## Data Protection, Privacy & GDPR Policy



**Approved by:** Melanie Lawlee

**Date:** 24/03/2026

**Review Date:** 24/03/2027

---

### 1. Context and Overview

Safe Hands Afterschool Club needs to gather, process and store certain information about individuals and organisations in order to operate effectively. This includes information relating to children, parents and carers, staff, volunteers, suppliers, contractors, regulators and other contacts that the club has a relationship with or may need to contact.

This policy explains how personal and business data must be collected, handled, used, stored and protected to meet Safe Hands Afterschool Club's data protection standards and to comply with current UK data protection law.

---

### 2. Purpose

This policy ensures that Safe Hands Afterschool Club:

- Complies with data protection law and follows good practice
  - Protects the rights of children, parents/carers, staff, customers and partners
  - Is transparent about how it stores and processes personal and business data
  - Protects the organisation from the risks associated with a data breach
  - Further detail regarding the retention and secure disposal of records is set out in **Appendix A – Record Retention Policy & Schedule**.
- 

### 3. Introduction

Safe Hands Afterschool Club recognises its legal and moral responsibility to protect personal data and to handle it in a lawful, fair and secure manner. All personal data must be treated with respect and confidentiality and processed only where there is a clear and lawful reason to do so.

---

### 4. Legal & Statutory Framework

This policy is informed by and complies with:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



- **Early Years Foundation Stage (EYFS) Statutory Framework 2025** – safeguarding and welfare requirements
- **Working Together to Safeguard Children 2023**

Note: The Data Protection Act 2018 replaced the Data Protection Act 1998 and works alongside UK GDPR.

---

#### 5. Data Protection Principles

Safe Hands Afterschool Club processes personal data in accordance with the UK GDPR principles. Personal data must:

1. Be processed **lawfully, fairly and transparently**
  2. Be collected for **specified, explicit and legitimate purposes**
  3. Be **adequate, relevant and limited** to what is necessary
  4. Be **accurate and kept up to date**
  5. Be kept **no longer than necessary**
  6. Be processed in accordance with the **rights of data subjects**
  7. Be **protected by appropriate technical and organisational measures**
  8. Not be transferred outside the UK unless adequate safeguards are in place
- 

#### 6. People, Risks and Responsibilities

##### Policy Scope

This policy applies to:

- Safe Hands Afterschool Club
- All staff, volunteers and students
- Contractors, suppliers and third parties working on behalf of the club (including Ofsted and Local Authority services)

It applies to **all personal data**, regardless of format, including data held electronically, on paper, or in any other form.

##### Types of Data Covered

This includes, but is not limited to:

- Names
- Postal addresses
- Email addresses
- Telephone numbers
- Banking and payment data



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



- Identity documents (e.g. passports, driving licences)
  - Images and photographs
  - Medical, safeguarding and special category data
- 

#### 7. Data Protection Risks

This policy helps protect Safe Hands Afterschool Club from risks including:

- Breaches of confidentiality
  - Inappropriate data sharing
  - Failure to offer individuals choice and control over their data
  - Reputational damage resulting from data loss or cyber security incidents
- 

#### 8. Responsibilities

Everyone who works for or with Safe Hands Afterschool Club has a responsibility to ensure personal data is handled appropriately.

##### Key Responsibilities

**The Company Owner** is ultimately responsible for ensuring legal compliance.

**The Data Protection Officer (DPO): Mel Lawlee** is responsible for:

- Keeping leadership informed of data protection responsibilities, risks and issues
- Reviewing data protection procedures and policies
- Arranging staff training and guidance
- Handling subject access requests
- Approving contracts involving data processing
- Ensuring systems and equipment meet security standards
- Monitoring third-party services and cloud providers
- Approving data protection statements in communications
- Managing media or external data protection enquiries
- Ensuring marketing activities comply with data protection law

All records are retained in line with agreed retention periods. Further details are outlined in **Appendix A – Record Retention Policy & Schedule**.

---



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



#### 9. General Staff Guidelines

All staff must:

- Only access data required for their role
  - Never share data informally
  - Keep data secure at all times
  - Use strong passwords and never share them
  - Ensure data is accurate and up to date
  - Dispose of data securely when no longer required
  - Seek guidance if unsure about any data protection issue
- 

#### 10. Data Storage and Security

##### Paper Records

- Stored in locked cabinets
- Not left unattended
- Shredded securely when no longer required

##### Electronic Records

- Password protected
- Stored on approved servers or secure cloud systems
- Backed up regularly
- Protected by firewalls and security software
- Not stored on personal devices

Personal data is retained only for as long as necessary to meet legal, safeguarding and operational requirements. Safe Hands Afterschool Club follows defined retention periods for different categories of records. These are detailed in **Appendix A – Record Retention Policy & Schedule**.

---

#### 11. Data Use

When using personal data:

- Screens must be locked when unattended
  - Data must not be shared informally or via unsecured email
  - Electronic transfers must be encrypted
  - Data must not be transferred outside the UK without safeguards
  - Only central, authorised systems must be used
-



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



#### 12. Data Accuracy

Safe Hands Afterschool Club takes reasonable steps to ensure data is accurate and up to date by:

- Limiting duplicate records
  - Regularly reviewing information
  - Making it easy for individuals to update their details
  - Correcting or deleting inaccurate data promptly
- 

#### 13. Subject Access Requests

Individuals have the right to:

- Know what data is held about them
- Access their data
- Understand how it is used
- Request corrections

Requests must be made in writing to the Data Protection Officer. Identity will be verified before information is released.

---

#### 14. Disclosure of Data

Personal data may be disclosed without consent where legally required, including to:

- Law enforcement agencies
- Safeguarding authorities

All disclosures will be verified and recorded.

---

#### 15. Privacy Information

Safe Hands Afterschool Club provides a **Privacy Notice** explaining:

- What data is collected
  - How it is used
  - How rights can be exercised
-



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



#### 16. What Data We Store and How

##### Customer Information

Stored securely on approved cloud systems and used only for childcare provision and essential communication. Marketing communications are opt-in and can be withdrawn at any time.

##### Staff Information

Includes; identity, payroll, DBS and emergency contact data, stored securely in paper and electronic formats.

---

#### 17. GDPR Compliance and Lawful Basis

The club has identified lawful bases for processing:

- **Contract** – staff employment and childcare provision
- **Consent** – newsletters and non-essential communications
- **Legal obligation** – safeguarding and EYFS compliance

Processing decisions are documented and reviewed regularly.

---

#### 18. Monitoring & Review

This policy is reviewed annually or sooner if:

- Legislation changes
  - A data breach occurs
  - EYFS guidance is updated
  - This policy and its supporting appendices, including **Appendix A – Record Retention Policy & Schedule**, are reviewed annually.
- 

#### 19. Related Policies

- Safeguarding & Child Protection Policy
- Confidentiality Policy
- Visitor Policy
- Accident & Incident Policy
- Record Retention Policy



# Safe Hands Afterschool Club

## Data Protection, Privacy & GDPR Policy



### Appendix A – Record Retention Policy & Schedule

*(Supporting Appendix to the Data Protection, Privacy & GDPR Policy)*

---

#### A1. Purpose of this Appendix

This appendix supports the **Data Protection, Privacy & GDPR Policy** and sets out how long Safe Hands Afterschool Club retains different categories of records, and how those records are securely disposed of when no longer required.

It ensures compliance with:

- **UK General Data Protection Regulation (UK GDPR)** – storage limitation principle
  - **Data Protection Act 2018**
  - **EYFS Statutory Framework 2025**
  - Relevant safeguarding, employment and financial legislation
- 

#### A2. Scope

This appendix applies to:

- All records created, processed or held by Safe Hands Afterschool Club
  - All formats of records, including paper, electronic, digital, photographic and cloud-based data
  - All staff, volunteers and students responsible for record creation or management
- 

#### A3. Key Principles

Safe Hands Afterschool Club ensures that:

- Records are retained only for legitimate, lawful and necessary purposes
  - Retention periods are proportionate and justifiable
  - Records are reviewed regularly
  - Secure disposal methods are used when records reach the end of their retention period
-



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



#### A4. Responsibilities

##### The Company Owner

Has overall responsibility for ensuring that record retention complies with legal and regulatory requirements.

##### Data Protection Officer (DPO) – Mel Lawlee

Is responsible for:

- Maintaining and reviewing the record retention schedule
- Advising staff on retention and disposal requirements
- Ensuring secure disposal methods are used
- Monitoring compliance with this appendix and when records reach the end of their retention period

##### All Staff

Are responsible for:

- Creating accurate and relevant records
  - Storing records securely
- 

#### A5. Secure Storage of Records

- Paper records are stored in **locked cabinets** with restricted access
  - Electronic records are password protected and stored on approved systems
  - Special category data (including safeguarding and medical records) is subject to enhanced security controls
- 

#### A6. Secure Disposal of Records

When records are no longer required:

- Paper records are **shredded or securely destroyed**
  - Electronic records are **permanently deleted**
  - Disposal is documented where appropriate
- 

#### A7. Record Retention Schedule

The following table outlines the standard retention periods applied by Safe Hands Afterschool Club. Retention periods may be extended where required due to safeguarding concerns, legal proceedings or professional advice.



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



#### *Record Retention Schedule*

Record Type	Retention Period	Legal / Operational Basis
Child registration records	Until the child reaches 21 years	EYFS / Limitation Act
Attendance registers	6 years	EYFS / safeguarding
Accident & incident records	Until the child reaches 21 years	EYFS / legal claims
Safeguarding / child protection records	Until the child reaches 25 years or transferred to receiving school	Statutory safeguarding guidance
Medical and dietary records	Duration of attendance + 1 year	Health & safety
Parental consent forms	Duration of attendance + 1 year	GDPR / EYFS
Photographs and video recordings	Until consent is withdrawn or data is no longer required	GDPR (consent-based)
Staff personnel files	6 years after employment ends	Employment law
Staff DBS records (certificate number and date only)	Duration of employment + 6 months	DBS guidance
Payroll records	6 years	HMRC
Financial and accounting records	6 years	HMRC
Contracts and service agreements	6 years after termination	Limitation Act
Visitor sign-in logs	1 year	Safeguarding
Complaints records	6 years	EYFS
Staff training records	Duration of employment + 3 years	EYFS / employment
Superseded policies and procedures	3 years	Governance and audit trail

#### **A8. Exceptions to Retention Periods**

Records may be retained beyond the stated retention period where:



## Safe Hands Afterschool Club

### Data Protection, Privacy & GDPR Policy



- There is an ongoing safeguarding concern
  - Legal action or investigation is pending
  - Advice from legal or safeguarding professionals recommends continued retention
- 

#### A9. Data Subject Rights

Individuals have the right to request access to records relating to themselves or their child, subject to safeguarding considerations. Requests will be handled in accordance with the **Data Protection, Privacy & GDPR Policy**.

---

#### A10. Review of this Appendix

This appendix is reviewed:

- Annually
- Following changes to legislation or EYFS guidance
- After a data breach or serious safeguarding incident