



## **Data Protection**

At All Stars Holiday Clubs, we respect the privacy of the children attending our Clubs, their parents and carers, and our staff. We want everyone using or working at All Stars Holiday Clubs to feel confident that their personal data is always handled safely and securely.

Our lead person for data protection is Georgie Moriarty. They ensure that the Club meets the requirements of the **General Data Protection Regulation (GDPR)**, liaises with statutory bodies when necessary, and responds to any subject access requests.

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## **Confidentiality**

At All Stars Holiday Clubs, we maintain confidentiality in the following ways:

- We only share information with a parent or carer about **their own child**.
- Information given to staff by parents about their child will not be passed on to third parties without consent, unless there is a safeguarding concern (as outlined in our Safeguarding Policy).
- Any concerns or evidence relating to a child's safety will be stored in a confidential file and shared only with the **Designated Safeguarding Lead** and the **Club Manager**.
- Staff discuss individual children only for planning and group management purposes.
- All staff are made aware of the importance of confidentiality during induction.
- Employment matters remain confidential and are shared only with those involved in personnel decisions.
- All personal data is stored securely on a password-protected device.

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## **Personal Data**

All personal data we hold is stored securely in a protected folder and kept separate from other company documents.

### Children and Parents/Carers -

We keep only the information necessary to provide a safe and effective childcare

service. This includes registration details, medical information, contact information, attendance, and incident or accident records. Our lawful basis for processing this data is to **fulfil our contract with the child's parents or carers**. Our legal condition for processing health-related information is to ensure we can provide appropriate care to the child. When a child leaves our care, we keep only the data required by law, insurance, or best practice for the appropriate period. Electronic data is deleted, and paper records are securely destroyed when no longer needed.

#### Staff -

We keep staff information to meet HMRC and other employment law requirements. Our lawful basis for processing this data is to meet our legal obligations. Any health-related staff data is processed to meet employment law duties. Data is retained for the statutory period after employment ends, then deleted or destroyed securely.

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### **Use of Images and Social Media**

At All Stars Holiday Clubs, we sometimes take photographs or videos of children taking part in activities for use in Club displays, newsletters, or on our website and social media pages.

We will **only use images of children with prior written consent** from parents or carers, obtained through our booking form. Parents and carers can withdraw their consent at any time by notifying the Club Manager in writing. We will never share children's full names, personal details, or any information that could identify them alongside their image.

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### **Sharing Information with Third Parties**

We only share child information with outside agencies on a **need-to-know basis** and with **parental consent**, except where it relates to safeguarding, criminal activity, or requests from legally authorised bodies (such as the Police or HMRC).

If information is shared without consent, we record the reasons in the child's file. We only share relevant, accurate, and up-to-date information. Our main priority is always the safety and wellbeing of the children in our care. Where safeguarding concerns arise, we follow government guidance: *Information Sharing Advice for Safeguarding Practitioners* (available at [www.gov.uk](http://www.gov.uk)).

Some limited personal data is shared with authorised third parties who help us operate - for example, booking systems, payroll, or accounting services. These third parties comply with GDPR and data protection laws.

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### Subject Access Requests

- Parents and carers may request to see information we hold about themselves or their child.
- Staff and volunteers may request to see information held about them.
- We will provide the information as soon as possible and within **one month** at the latest.

If any information is incorrect or out of date, we will update it promptly. Parents, carers, or staff may ask for data to be deleted, though some data must be kept by law. In some cases, deleting data may mean we can no longer provide childcare or employment. Certain records must be retained for set periods, even after a child leaves our care or an employee leaves the Club.

If anyone has a concern about how their information has been handled, or how we have responded to a data request, they can contact the **Information Commissioner's Office (ICO)**.

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### GDPR

All Stars Holiday Clubs complies fully with the requirements of the **General Data Protection Regulation (GDPR)** in how we obtain, store, and use personal data.

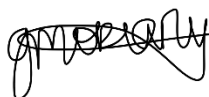
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Policy created by All Stars Holiday Clubs

Date: October 2025

To be reviewed in October 2026

Signed by



Georgie Moriarty (Club Founder)

*Written in accordance with the Statutory Framework for the Early Years Foundation Stage (2023):  
Safeguarding and Welfare Requirements: Information and records [3.69 -3.73].*