

Privacy Policy for Parents/Carers - use of your child's personal data

Under data protection law, individuals have a right to be informed about how the club uses any personal data that we hold about them. We comply with this right by providing 'Privacy Notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

At T-Club-6 Ltd we respect the privacy of the children attending the club and the privacy of their parents or carers. The personal data that we collect about you and your child is used only to provide appropriate care for them, maintain our service to you and communicate with you effectively.

Any information that you provide is kept secure. Data that is no longer required is erased after you have informed us that your child has ceased attending our club.

This Privacy Notice explains how we collect, store and use personal data about children.

We, T-Club-6 Ltd, C/o Reigate Priory School, Bell Street, Reigate, Surrey RH2 7RL, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Mrs. Fiona Neville (see 'Contact us' below).

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about children includes, but is not restricted to:

- Personal Information, such as name and address
- Contact details, contact preferences, date of birth, identification documents
- Characteristics, such as ethnic background, language, nationality, country of birth
- Attendance information, such as sessions attended, number of absences and absence reasons)
- Payment Details, (such as credit/debit card details). T-Club-6 does not store customers' financial details.
- Details of any medical conditions, including physical and mental health
- Special Educational Needs
- Exclusion information
- Safeguarding information (Court Orders and Professional Involvement)
- Details of any support received, including care packages, plans and support providers
- Photographs (are stored on the password protected club laptop, which are only accessible by the manager. Consent is obtained through our registration process and may be used for publicity/social media.

We may also hold data about children that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We will use the contact details you give us to contact you via phone, email, social media, and post so that we can send you information about your child, our Club and other relevant news and also so we can communicate with you regarding payment of our fees.

We may also use this data to:

- Support the child's care
- Monitor and report on children's progress
- Provide appropriate pastoral care
- Protect child welfare
- Assess the quality of our services
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use children's personal data when the law allows us to.

Most commonly, we process it where:

- We need to comply with a legal obligation (e.g. Safeguarding, Ofsted Requirements)
- Contract (providing childcare services)
- Legitimate interest (running the club)
- Consent (where appropriate e.g. photos/marketing)
- We need it to perform an official task in the public interest

Where we have obtained consent to use children's personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using children's personal data overlap, and there may be several grounds that justify our use of this data.

Collecting this information

While the majority of information we collect about children is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

Any information that you provide is kept secure. We keep personal information about children while they are attending our club. We may also keep it beyond their attendance at our club if this is necessary in order to comply with our legal obligations as detailed in our Documentation and Information policy.

Retention Schedule

We have a statutory duty to keep certain types of data:

- Attendance registers - retained for 7 years after the child has left the club
- Accidents/incident records – retained for 3 years from date of last entry or where the accident involves a child/young adult then until the child/young adult reaches the age of 21.
- Safeguarding/Child protection records – retained until the child/young person reaches the age of 25
- Child registration records – deleted securely after retention period end
- Photos – deleted when no longer required or consent withdrawn

For further details on our retention schedule, please see our Documentation and Information policy.

Data sharing

We will only disclose personal information to government bodies and law enforcement agencies, successors in title to our business and suppliers we engage to process data on our behalf.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the address below. We will promptly correct any information found to be incorrect.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about children with:

- Our local authority (LA) and the Department for Education (DfE).

- The child's family and representatives
- Our regulator, Ofsted
- Suppliers and service providers - to enable them to provide the service we have contracted them for
- Central and local government
- Local Authority Auditors
- Schools that the children attend after leaving us (Secondary and In-Year Transitions)
- Survey and research organisations
- Health authorities
- Health and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals to meet our legal obligations such as safeguarding concerns

Security

We are committed to ensuring that your personal information is secure. Whilst we make all reasonable efforts to maintain security of your personal information, we assume no responsibility for the security of such information.

Cookies

A cookie is a small file, which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse the web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operation to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We use essential cookies to recognize members who have previously logged in and to ensure that restricted member content is delivered correctly.

We use analytics cookies to identify which pages are being used. This helps us analyse data about web traffic and improve our web site in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you chose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK or European Economic Area (EEA), we will do so in accordance with data protection law.

Parents and children' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the club holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data, taking into account the child's age and understanding, or where the child has provided consent.

If you make a subject access request, and if we do hold information about you or your child,

we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer (as detailed below).

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer, giving 14 days notice in writing.

Data Breach Management

T-Club-6 Ltd takes the security of personal information seriously. We have procedures in place to respond to any suspected or actual personal data breach.

A personal data breach may include (but is not limited to):

- Personal information being lost, stolen or accidentally deleted
- Personal information being accessed by someone who is not authorised to see it
- Information being sent to the wrong person
- A failure of our systems that results in personal data being unavailable or exposed

If we become aware of a suspected data breach, we will:

1. Record and assess the incident

- The details of the breach will be recorded, including what information may have been affected, when it occurred, who is involved and what actions have been taken.

2. Take immediate action

- We will take reasonable steps to contain the breach and reduce any potential harm, for example:
 - recovering incorrectly sent information where possible
 - changing passwords or restricting access
 - contacting relevant providers if systems are affected

3. Investigate and review

- We will assess the level of risk to children, parents/carers and staff.
- Where appropriate, we will inform affected individuals and provide advice on any steps they may need to take.

4. Report to the Information Commissioner's Office (ICO)

- Where a personal data breach is likely to result in a risk to individuals' rights and

freedoms, we will report it to the ICO within 72 hours of becoming aware of it, where required by data protection law.

5. Prevent recurrence

- Following any significant breach, we will review our procedures and implement improvements where necessary.

Where a breach involves children's personal data, including safeguarding, medical or contact information, we will treat the matter as a priority and consider whether parents/carers, safeguarding partners or other relevant authorities need to be informed. All data breaches will be managed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

- Mrs. Fiona Neville, Chairperson

committee@tclub6.org.uk

or write to:

Fiona Neville, Chairperson,
T-Club-6 Ltd, C/o Reigate Priory School,
Bell Street, Reigate, Surrey RH2 7RL