Data Protection Policy

At Let's Play we respect the privacy of the children attending all sessions and the privacy of their parents or carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at any Let's Play session/club can do so with confidence that their personal data is being kept secure.

Our lead person for data protection is Daniel Sleet. The lead person ensures that Let's Play meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

Confidentiality

Within Let's Play we respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to Let's Play staff about their child will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our **Safeguarding Policy**).
- Concerns or evidence relating to a child's safety, will be kept in a confidential file and will not be shared within the session, except with the designated Child Protection Officer and the manager.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- All personal data is stored securely in a lockable file and on a password protected computer.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.

Information that we keep

The items of personal data that we keep about individuals are documented on a password protected computer. This system is reviewed annually to ensure that any new data types are included.

Children and parents*:* We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parents. Our legal condition for processing any health-related information about a child, is so that we can provide appropriate care to the child. Once a child leaves our care, we retain only the data

required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely or returned to parents

Staff: We keep information about employees in order to meet HMRC requirements, and to comply with all other areas of employment legislation. Our lawful basis for processing this data is to meet our legal obligations. Our legal condition for processing data relating to an employee's health is to meet the obligations of employment law. We retain the data after a member of staff has left our employment for the periods required by statutory legislation and industry best practice, then it is deleted or destroyed as necessary.

Sharing information with third parties

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g Police, HMRC, etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR.

Subject access requests

Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.

Staff and volunteers can ask to see any information that we keep about them.

We will make the requested information available as soon as practicable and will respond to the request within one month at the latest.

If our information is found to be incorrect or out of date, we will update it promptly.

Parents /carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care, we have to keep some data for specific periods so won't be able to delete all data immediately.

Staff and volunteers can ask us to delete their data, but this may mean that we can no longer employ them as we have a legal obligation to keep certain data. In addition, even after a staff member has left our employment, we have to keep some data for specific periods so won't be able to delete all data immediately.

If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.

HOW/WHERE WE STORE YOUR DATA?

We store all of our data on our third-party booking system 'Coordinate Sport'. See below in full their privacy statement which all parent/carers agree to in-line with their booking with us:

PRIVACY NOTICE
REGARDING DATA HELD BY LET'S PLAY

1 - This notice is intended to inform you about the information that we hold in relation to you, why we hold it, for how long and your rights in respect of the information that we hold. Changes in data protection laws in 2018 will mean that you will have the right to ask us what information we hold, and you will also have the right in certain circumstances to ask us to delete information or to anonymise any papers that we hold on your files. The law regarding this is contained in Regulation (EU) 2016/679 of The European Parliament and of The Council. The regulations are known as the EU General Data Protection Regulation (GDPR).

2 - The responsible entity: Let's Play and its officers are responsible to you for the privacy of your data and the safe and proper handling of it.

3 - Compliance: Any clients, customers or suppliers are Data Controllers under GDPR and Let's Play is the Data Processor. Both Data Controllers and Data Processors are obliged to comply with the GDPR and we rely on your attention and observance where required.

4 - Employees: Let's Play ensures that all of its employees are aware of the confidential nature of Personal Data, have adequate training in relation to the data protection legislation and that they are bound by relevant obligations and restrictions when processing Personal Data.

5 - Any use that we make of your data must be fair and lawful. We will hold all confidential and personally identifiable information and data concerning our clients, customers, suppliers and partners securely and in confidence using appropriate technical and organisational measures.

6 - We will only use your data for the purposes for which it was provided under the applicable terms of business and to comply with any statutory requirements upon us.

7 - Except as set out in paragraph 8 and 14 below, your information and data will NEVER be passed on to another organisation under any circumstances.

8 - When required we may provide relevant data to other parties such as to our accountants for the purposes of providing our accounting services to us and to enable us to comply with any audit requirements generally. All such parties have stringent data processing obligations and they are not authorised to use your data other than for the purposes of the reference/accounts/audit as above mentioned.

9 - On occasion, we may use your data to contact you to find out if you have been satisfied with the work carried out on your behalf or to let you know of any events or offers that we may wish you to be aware of. Please notify us if you do not wish to be contacted in this way.

10 - We may on occasion place marketing materials on to our website or Social Media sites. If you do not wish us to place anything incorporating your photograph (e.g. as part of a group photo at an event) please let us know. We will always respect your wishes.

11 - SAR Requests: We will handle subject access requests (SAR) promptly, however when we consider SAR's to be manifestly unfounded, excessive or to adversely affect the rights and freedoms of others, we will refuse the request.

12 - Article 28: If an audit or inspection is required to evidence that Let's Play is meeting its obligations under Article 28, Let's Play will assist appropriately but will inform the Client if it is asked to do something infringing the GDPR or the other UK, EU or member state data protection law.

13 - ICO: Let's Play proposes to co-operate with supervisory authorities (such as the ICO) in accordance with Article 31.

14 - Sub-contractors: The Client has been informed that Let's Play may transfer data to a sub-processor or data controller to fulfil some, or all, of the contract. In these cases, Let's Play will put in place a contract with the processor to adequately protect personal data. The Client consents to this processing.

15 - Data breach: In the event of any personal data breach, we will notify our Clients in accordance with Article 33.

16 - Client Instructions: The Client acknowledges that Let's Play is reliant on the Client for direction as to the extent to which it is entitled to use and process Personal Data. No liability is accepted by Let's Play for any claim arising from any act or omission by it, to the extent that such act or omission resulted directly from Client's instructions.

17 - Consent and revocation: After reading this notice you are asked to indicate your consent to us continuing to hold your data in the manner and for the purposes above mentioned. Subject as set out below, you are entitled to revoke your consent at any time and if so, we will keep a record of when you asked us to cease processing your data and we will advise you of what continues to be held by us and when we are legally able to delete it.

18 - If you revoke your consent, it may affect the relationship between us and we will not be liable for any consequential issues arising. In certain circumstances, we may be obliged to cease to supply goods or services.

19 - We are legally obliged to hold your information and our files in relation to work carried out for you for up to [6 years] in most cases. You cannot ask us to erase this information.

20 - Contact Us: If you wish to contact us about the use being made of your data, you should send any communication to the Coordinate Support Team; the electronic email address is support@coordinate.cloud

This policy was adopted by: Daniel Sleet	Date: 7th November 2025
To be reviewed: 7th November 2026	Signed: D.Sleet

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017):*
Safeguarding and Welfare Requirements: Information and records [3.68 -3.7]