

Data Protection & GDPR Policy

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**1. Purpose**

This policy outlines how Hearts & Hands collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to safeguarding the privacy of children, parents/carers, and staff by handling all personal data lawfully, fairly, and transparently.

**2. Data Controller**

Hearts & Hands is the Data Controller for the purposes of data protection law.

Contact Details

Email: nightingaleckent@gmail.com

Phone: 07842392245

Address: Nightingale Cottage, Tonbridge Road, Kent, TN11 9PA

**3. What Data We Collect**

We collect and process personal data as part of the registration and consent process. This may include:

For Children:

Full name

Date of birth

Address

School Name

Medical conditions, allergies, or dietary needs

Emergency contact details

Attendance records

Any behaviour or incident reports

For Parents/Carers:

Full name

Contact details (phone, email, address)

Legal guardian status

Consent for photos, walks, medical treatment

**4. Legal Basis for Processing**

We process personal data under the following legal bases:

Consent – where you have given clear permission (e.g. for medical treatment or photographs).

Legal Obligation – to meet requirements under safeguarding or health and safety law.

Vital Interests – in emergencies where a child’s wellbeing is at risk.

Legitimate Interests – to manage and operate the club efficiently.

**5. How We Use Your Data**

We use personal data to:

Provide safe care to children

Manage attendance and records

Contact parents in emergencies

Comply with safeguarding and legal duties

Administer registration, billing, and communication

Promote the club (only with consent, e.g. for photos)

**6. Data Sharing**

We will never sell personal data. We only share information when legally required or to protect a child’s welfare. This may include:

Emergency services (e.g. ambulance)

Local authority safeguarding teams

Insurers (in the case of a serious incident)

Regulatory bodies (if required by law)

We ensure that any third party we work with complies with data protection standards.

**7. Data Storage and Security**

Paper forms are stored in locked cabinets.

Electronic records are stored securely with password protection and restricted access.

Only authorised staff can access personal information.

We review our security practices regularly to keep data safe.

**8. Data Retention**

We retain personal data only as long as necessary:

| Data Type | Retention Period |

| ----------------------------- | ------------------------------------------ |

| Registration/consent forms | 3 years after last attendance |

| Medical/incident reports | 3 years (or longer if required by insurer) |

| Financial/billing information | 6 years (for HMRC compliance) |

Once data is no longer required, it will be securely destroyed or deleted.

**9. Your Rights**

Under the UK GDPR, you have the right to:

Access your or your child’s data

Request correction of inaccurate data

Request erasure of data (in some cases)

Object to processing (e.g. photo use)

Withdraw consent at any time

Lodge a complaint with the Information Commissioner’s Office (ICO)

To make a request, please contact: nighingaleckent@gmail.com

**10. Breach Notification**

We have procedures in place to detect, report, and investigate personal data breaches. Where legally required, we will notify the ICO and affected individuals without undue delay.

**11. Policy Review**

This policy is reviewed annually or when there is a significant change in data practices or legislation.