

Data Protection and Privacy Policy

Allstars Holiday Club

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1. Policy Statement

Allstars Holiday Club is committed to protecting the privacy and security of personal information. We comply with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018** in the way we collect, store, use, and share personal data. This policy explains what data we collect, why we collect it, how it is handled, and the rights individuals have.

2. Scope

This policy applies to all staff, parents/carers, children, volunteers, and third-party service providers who handle or access personal data on behalf of Allstars.

3. What Data We Collect

We may collect and process the following categories of personal data:

For children:

- Full name, date of birth, gender
- Address and contact details
- Emergency contacts
- Medical and dietary information
- Attendance and safeguarding records
- Photos/videos (with consent)

For parents/carers:

- Names, addresses, phone numbers, email addresses
- Consent forms and communication preferences
- Payment records

For staff and volunteers:

- Contact details, employment records, DBS numbers
- Qualifications and training records
- Vetting and reference information

4. Lawful Basis for Processing

We process personal data under one or more of the following legal bases:

- Consent (e.g. marketing communications, photos)
- Contractual obligation (e.g. service agreements with parents)
- Legal obligation (e.g. safeguarding, HMRC records)
- Vital interests (e.g. emergency contact or medical needs)
- Legitimate interests (e.g. monitoring attendance to improve our service)

5. How We Store and Protect Data

- Personal data is stored securely, whether on paper, cloud-based systems, or local devices
- Access is restricted to authorised staff only
- Data is password-protected, encrypted, and regularly backed up
- Paper records are locked and disposed of securely when no longer required

6. Sharing of Data

We only share personal data where necessary and with appropriate safeguards. This may include:

- Emergency services
- Ofsted or local authorities (for safeguarding or regulatory reasons)
- Software providers for secure bookings or administration (with appropriate data processing agreements)
- We never sell or rent personal data to third parties

7. Retention Periods

We retain data in line with legal and operational requirements:

- Child records are kept for a minimum of 3 years after the child leaves
- Safeguarding records may be kept longer as required
- Financial and tax records are retained for 6 years

8. Your Rights

Individuals have the right to:

- Access the personal data we hold about them
- Request correction or deletion
- Object to or restrict processing
- Withdraw consent (where applicable)
- Lodge a complaint with the **Information Commissioner's Office (ICO)**

ICO Website: www.ico.org.uk

9. Data Breaches

In the event of a data breach, we will follow the ICO's guidance and notify affected individuals and authorities where required.

10. Review

This policy is reviewed annually or when legal or operational changes occur.

Date of next review: August 2026

Policy lead: Data Protection Officer / Club Manager