GDPR POLICY

Effective from 1 September 2026 | Review date: 1 September 2027

Introduction

Impact Provision Team Ltd, trading as **Impact Wrap Around Care** ("Impact", "we", "us"), takes the privacy of children, parents, carers and authorised collectors seriously. This policy explains what personal information we collect, why we use it, how we protect it, who we may share it with and the rights individuals have in relation to their information.

We handle personal information in accordance with the **UK GDPR**, the **Data Protection Act 2018** and relevant amendments introduced by the **Data (Use and Access) Act 2025**. Children require particular protection, so our systems and working practices are designed with their safety and privacy in mind.

1. Information we collect

Parents and carers provide information through our registration and booking process. Depending on the needs of the child and the permissions selected, this may include:

- **Child identity and registration:** child's name, preferred name, date of birth, age, ethnicity, class and other registration information.
- **Parental responsibility and collection:** who has main parental responsibility, authorised collectors, any court/order information that excludes a person from collecting the child, and a collection password that must be known by the person collecting.
- **Health, dietary and support information:** medical notes, dietary notes, allergies or other relevant health information, details of specialist involvement (for example speech therapy), and information about an IEP or other reports that support learning or development.
- **Interests and care preferences:** activities the child particularly enjoys and any activities the parent or carer does not want the child to take part in.
- **Emergency medical consent:** permission for the Manager to seek necessary emergency medical advice or treatment while the child is in our care.
- **Permissions and consents:** choices relating to promotional photographs, access to supervised IT devices, plasters, assistance with sun protection, age-appropriate film/television material, and face or hand painting.
- **Administrative records:** administrator-only notes, attendance records, booking records, payments and billing information, and records of communications with parents/carers.
- **Parent/carer declarations:** confirmation that information supplied is accurate and will be kept up to date, and acknowledgement that relevant information may be shared with professionals involved in the child's care where appropriate.

2. Special category information

Some information we collect is classed as **special category data**, including information about ethnicity and health. We only collect and use this information where it is necessary and proportionate for the child's care, inclusion, safeguarding, welfare or legal/compliance requirements. Where special category data is processed, we identify both an appropriate lawful basis under UK GDPR Article 6 and an additional condition under Article 9.

3. How we use personal information

- To register children and administer bookings, attendance, collections and payments.
- To provide safe, suitable and inclusive wrap-around childcare and respond to a child's individual needs.
- To contact parents/carers, authorised collectors or emergency contacts about the child or the service.
- To manage health, dietary, allergy, medical, SEND and safeguarding needs and respond appropriately in an emergency.
- To meet our legal and regulatory duties, including safeguarding, health and safety, Ofsted/childcare requirements, financial record-keeping and responding to lawful requests.
- To manage optional activities and permissions selected by parents/carers.
- Where specific consent has been given, to use photographs for promotional purposes. Promotional consent can be withdrawn at any time for future use.

4. Our lawful bases for using information

The lawful basis depends on the purpose for which the information is used. We may rely on **contract** where processing is needed to provide the booked childcare service; **legal obligation** where we must keep or use information to comply with law or regulation; **vital interests** where information is necessary to protect a child or another person in a serious emergency; **legitimate interests** where use is necessary for the safe and effective operation of our service and those interests do not override the child's or family's rights; and **consent** for genuinely optional uses such as promotional photography where consent is the appropriate basis.

5. Data sharing

We do not sell personal information. We only share information where there is a clear need and a lawful basis. This may include sharing relevant information with:

- Impact employees and managers who need the information to provide safe care.
- The child's school or other education/childcare professionals where necessary for continuity of care, safeguarding or support.
- Health professionals, emergency services or other professionals where required to protect a child's health, safety or welfare.
- Local authorities, Ofsted, safeguarding partners, police or other statutory/regulatory bodies where we are required or permitted by law to do so.
- Service providers that process information on our behalf, such as booking, payment, IT, email or secure storage providers, under appropriate data-protection arrangements.

We do **not** require consent before sharing information where sharing is necessary for safeguarding or to comply with a legal obligation. We will only share what is relevant and necessary.

6. How we protect information

- Access to personal information is limited to people who need it for their role.

- Administrator-only information is restricted to authorised users.
- Electronic systems are protected using appropriate access controls and passwords.
- Staff are expected to keep personal information confidential and follow our safeguarding and data-protection procedures.
- Paper records, where used, are stored securely and disposed of confidentially when no longer required.
- We take reasonable steps to ensure third-party processors provide appropriate security for the information they handle on our behalf.

7. Accuracy and changes to information

Parents and carers are responsible for telling us promptly about changes to contact details, authorised collectors, parental responsibility, court orders, medical history, allergies, dietary needs, medication, SEND information or any other detail relevant to the child's care. We will update records when we are notified of changes.

8. Retention and secure disposal

We keep personal information only for as long as it is needed for the purpose for which it was collected and to meet legal, safeguarding, insurance, accounting or regulatory requirements. Different types of records may have different retention periods. When information is no longer required, it is securely deleted or confidentially destroyed. We do not retain information simply "just in case".

9. Photographs and optional consent

Promotional photography is optional. Where a parent/carer has given consent, images may be used for Impact promotional purposes. Consent may be withdrawn at any time by contacting us; withdrawal will apply to future use, although it may not always be possible to recall material that has already been lawfully published or distributed.

Other activity permissions recorded at registration are used to help staff understand what a child may or may not take part in. Parents/carers can ask us to update these permissions.

10. Individual rights

Subject to the circumstances and any legal exemptions, individuals may have the right to access personal information, request correction of inaccurate information, request erasure, restrict or object to certain processing, and withdraw consent where consent is the lawful basis. Children also have data-protection rights in their own right; whether a parent/carer may exercise those rights on the child's behalf depends on the child's age, understanding and the circumstances.

11. Data breaches

Any suspected loss, unauthorised disclosure, misuse or security incident involving personal information must be reported immediately to the management of Impact. We will investigate, take steps to reduce risk, keep appropriate records and, where legally required, notify the Information Commissioner's Office (ICO) and/or affected individuals.

12. Contact, concerns and complaints

For questions about this policy, to update information, withdraw an optional consent, or exercise a data-protection right, please contact **impactwraparound@gmail.com**.

If you remain concerned about how your personal information has been handled, you also have the right to raise a complaint with the Information Commissioner's Office (ICO).

13. Policy review

This policy is effective from **1 September 2026** and will be reviewed at least annually, or sooner if legislation, regulatory guidance, systems or our processing activities change.