



Privacy & Data Protection Policy

Organisation: Kids Adventure Days Ltd

Policy Owner: Kids Adventure Days Ltd

Contact Email: Support@kidsadventuredays.com

Emergency Contact Number: 07555 539376

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Review Frequency: Annually, or sooner following changes to data-protection law, systems, suppliers or Kids Adventure Days operations

Version: 2.0

1. Policy Statement

Kids Adventure Days Ltd is committed to protecting the privacy and personal information of children, parents/carers, employees, applicants, volunteers, contractors and others who interact with our organisation.

We recognise that we handle particularly sensitive information relating to children and families and therefore take our data-protection responsibilities seriously.

We aim to ensure that personal information is:

- Processed lawfully, fairly and transparently.
- Collected for clear and legitimate purposes.

- Limited to information that is reasonably necessary.
- Kept accurate and up to date where necessary.
- Retained only for an appropriate period.
- Protected against unauthorised access, loss or misuse.
- Shared only where there is an appropriate reason.
- Handled in accordance with applicable data-protection legislation.

2. Scope

This policy applies to personal information processed by Kids Adventure Days relating to:

- Children.
- Parents and carers.
- Emergency contacts.
- Employees.
- Job applicants.
- Volunteers.
- Contractors and activity leaders.
- Schools and professional contacts.
- Website users.
- Individuals making enquiries.
- Other people interacting with Kids Adventure Days.

It applies to information held:

- Electronically.
- Within booking systems.
- Within business systems.
- In email.
- On authorised devices.
- In cloud storage.
- On paper.
- Within photographs and videos.
- In other records controlled by Kids Adventure Days.

3. Data Controller

Kids Adventure Days Ltd determines how and why much of the personal information used to operate its services is processed and will act as a data controller where applicable.

Questions about personal information or this policy can be directed to:

Kids Adventure Days Ltd

Email: Support@kidsadventuredays.com

4. Data Protection Principles

Kids Adventure Days will aim to comply with the key principles of UK data-protection law.

Personal information will be:

Lawful, Fair and Transparent

We will have an appropriate reason for processing personal information and aim to explain relevant processing clearly.

Purpose Limited

Information will be collected for specified and legitimate purposes and not unnecessarily used for unrelated purposes.

Data Minimised

We will aim to collect only information reasonably required for the relevant purpose.

Accurate

Reasonable steps will be taken to keep relevant information accurate and correct inaccurate information where necessary.

Storage Limited

Personal information will not be retained indefinitely without an appropriate reason.

Secure

Appropriate organisational and technical measures will be used to protect personal information.

5. Information We May Collect About Children

Depending on the service being provided, information may include:

- Full name.
- Date of birth.
- Age.
- School.
- Year group.
- Attendance information.
- Booking information.
- Parent/carer details.
- Emergency contacts.
- Authorised collection information.
- Medical information.
- Allergies.
- Medication information.
- SEND or additional support information.
- Dietary requirements.
- Behaviour/support information.
- Safeguarding information.
- Accident and incident records.
- Photographs/videos where appropriate.
- Photography and marketing consent.
- Other information necessary to provide safe and appropriate care.

We will not intentionally collect unnecessary information about children.

6. Information We May Collect About Parents and Carers

Information may include:

- Name.
- Address.
- Email address.
- Telephone number.
- Relationship to the child.
- Emergency contact information.
- Booking information.
- Payment information.
- Communications with Kids Adventure Days.
- Complaints or feedback.
- Collection authorisations.

- Relevant consent preferences.

7. Staff, Applicants and Contractors

For staff, job applicants, volunteers and contractors, information may include:

- Name.
- Address.
- Contact information.
- Date of birth.
- Identity documentation.
- Right-to-work information.
- Employment history.
- References.
- Qualifications.
- Training records.
- DBS-related information.
- Recruitment information.
- Payroll and payment information.
- Attendance.
- Performance/employment records.
- Safeguarding and suitability information where appropriate.

Access to sensitive recruitment and employment information will be appropriately restricted.

8. Special Category and Sensitive Information

Kids Adventure Days may need to process information requiring additional protection.

For children this may include information concerning:

- Health.
- Allergies.
- Disabilities.
- SEND.
- Medical conditions.
- Religious dietary requirements.
- Other information necessary to provide safe care.

Safeguarding information may also be particularly sensitive.

Such information will only be processed where there is an appropriate legal basis and condition for doing so.

9. Why We Use Personal Information

Personal information may be used to:

- Register children.
- Manage bookings.
- Provide childcare and activities.
- Maintain attendance records.
- Contact parents/carers.
- Manage collection arrangements.
- Protect children's health and safety.
- Manage allergies and medication.
- Support SEND and additional needs.
- Safeguard children.
- Respond to emergencies.
- Process payments.
- Maintain financial records.
- Manage complaints.
- Recruit and manage staff.
- Meet legal and regulatory requirements.
- Maintain insurance records.
- Communicate with schools and host venues.
- Promote Kids Adventure Days where appropriate consent or another lawful basis applies.
- Operate and improve our website and business systems.

10. Lawful Bases

The lawful basis used will depend on the particular processing activity.

Kids Adventure Days may rely on bases including:

Contract

Where processing is necessary to provide a booked service or take steps connected with a contract.

Legal Obligation

Where information must be processed to comply with a legal requirement.

Legitimate Interests

Where Kids Adventure Days has a legitimate business or operational reason to process information and those interests are not overridden by individuals' rights and interests.

Consent

Where consent is the appropriate basis, including certain optional marketing or photography activities.

Vital Interests

In exceptional circumstances, information may be processed where necessary to protect someone's life.

Where special-category information is processed, an additional lawful condition will be identified where required.

11. Children's Information

Kids Adventure Days recognises that children's personal information requires particular protection.

We will aim to:

- Collect only information reasonably necessary.
- Restrict access.
- Explain relevant uses to parents/carers.
- Use information for legitimate childcare, safeguarding and operational purposes.
- Avoid unnecessary public identification of children.
- Maintain appropriate photography controls.
- Protect safeguarding and medical records.

Children's information will not be sold.

12. Booking Systems

Kids Adventure Days may use third-party booking and administration systems to manage:

- Registrations.
- Bookings.
- Attendance.
- Parent/carer information.
- Medical information.
- Consent.
- Payments or payment-related information.
- Communications.

Third-party providers handling personal information on our behalf will be expected to provide appropriate data-protection and security safeguards.

13. Payment Processing

Payments may be processed through authorised third-party payment providers.

Kids Adventure Days will not unnecessarily collect or retain full payment-card information where this is handled securely by an authorised payment processor.

Payment and transaction information may be retained where required for accounting, contractual or legal purposes.

14. Sharing Information

Kids Adventure Days may share personal information where appropriate with organisations including:

- Schools.
- Host venues.
- Children's social care.
- Police.
- Local authorities.
- Ofsted.
- Healthcare or emergency professionals.
- Insurers.
- Accountants and professional advisers.
- Booking-system providers.
- Payment processors.
- IT/cloud-service providers.
- Other organisations providing legitimate services to Kids Adventure Days.

Only information reasonably necessary for the purpose should be shared.

15. Safeguarding Information Sharing

Protecting a child may require information to be shared with:

- School DSLs.
- Children's social care.
- Police.
- LADO.
- Ofsted.
- Healthcare professionals.
- Other safeguarding agencies.

Consent is not always required before safeguarding information can be shared.

Data-protection law must not be used as a reason to prevent appropriate information sharing where a child's safety or welfare is at risk.

Safeguarding decisions should be appropriately recorded.

16. Information Security

Kids Adventure Days will take reasonable steps to protect personal information.

Measures may include:

- Password-protected systems.
- Appropriate access controls.
- Restricted staff permissions.
- Secure cloud storage.
- Locked storage for paper records.
- Authorised business devices.
- Appropriate password practices.
- Staff confidentiality requirements.
- Secure disposal of records.

Access should be limited to people who require the information for their role.

17. Staff Personal Devices

Staff must not routinely store children's or families' personal information on personal devices.

Staff personal devices must not be used to photograph or film children.

Personal messaging, email or cloud-storage accounts must not be used to store children's confidential records.

Relevant information should be processed through authorised Kids Adventure Days systems.

18. Paper Records

Where paper records are used, they must be appropriately protected from unauthorised access.

Sensitive records should be stored securely when not in use.

Paper records containing personal information must not be left unnecessarily visible or unattended.

When no longer required, confidential paper records will be disposed of securely.

19. Photography and Video

Identifiable photographs and videos constitute personal information.

Kids Adventure Days will:

- Follow its Photography & Image Sharing Policy.
- Obtain appropriate consent for optional uses where required.
- Use authorised devices.
- Store images securely.
- Restrict access.
- Avoid publishing children's full names alongside public photographs.
- Respect changes to relevant consent.

20. Website and Online Enquiries

When individuals use the Kids Adventure Days website or contact us online, we may process information such as:

- Name.
- Email address.
- Telephone number.
- Information included in an enquiry.
- Technical information generated through use of the website where applicable.

Website users should be provided with appropriate privacy information explaining relevant processing.

21. Cookies and Similar Technologies

The Kids Adventure Days website may use cookies or similar technologies.

Some cookies may be necessary for the website to operate.

Where non-essential cookies or similar technologies require consent, appropriate consent arrangements should be used.

Information about website cookies should be provided through an appropriate cookie notice or policy.

22. Marketing Communications

Kids Adventure Days may communicate with families about relevant services and activities where there is an appropriate lawful basis.

Where consent is required for electronic marketing, appropriate consent will be obtained.

Individuals will be given an appropriate way to opt out of marketing communications.

Operational messages concerning a booking, child's care, payment or service are different from optional marketing communications.

23. Data Retention

Kids Adventure Days will retain personal information only for as long as there is an appropriate legal, regulatory, safeguarding, insurance, contractual or operational reason.

Different categories of information may require different retention periods.

Retention decisions may take account of:

- Childcare requirements.
- Safeguarding guidance.
- Limitation periods.
- Insurance requirements.
- Tax and accounting requirements.
- Employment law.
- Regulatory requirements.

A retention schedule may be maintained separately from this policy so that periods can be updated when requirements change.

24. Safeguarding Records

Safeguarding records may need to be retained for longer than ordinary operational records.

Retention will take account of:

- Nature of the concern.
- Applicable safeguarding guidance.
- Legal requirements.
- Insurance requirements.
- Potential future need to understand safeguarding history.

Safeguarding records will be stored securely and access restricted.

25. Financial Records

Financial and accounting information will be retained for the period required by applicable tax, accounting and legal requirements.

26. Recruitment and Employment Records

Recruitment and employment information will be retained according to the nature of the record and applicable legal, safeguarding and operational requirements.

DBS-related information will receive particularly careful handling.

Kids Adventure Days will avoid retaining unnecessary copies of DBS certificates beyond an appropriate period unless there is a lawful reason to do so.

27. Individual Rights

Depending on the circumstances and applicable law, individuals may have rights including:

- Right to be informed.
- Right of access.
- Right to rectification.
- Right to erasure.
- Right to restrict processing.
- Right to data portability.
- Right to object.
- Rights relating to certain automated decision-making.

Not every right applies in every situation.

For example, safeguarding or legal obligations may mean information cannot simply be erased on request.

28. Subject Access Requests

Individuals may request access to personal information Kids Adventure Days holds about them, subject to applicable legal rules and exemptions.

Requests should be sent to:

Support@kidsadventuredays.com

Kids Adventure Days will respond within the applicable statutory timeframe.

Identity may need to be verified before personal information is disclosed.

29. Requests Concerning Children's Information

A parent/carers may make a request relating to their child's information where appropriate.

The child's rights and interests must also be considered.

Depending on the child's age, understanding and circumstances, it may not always be appropriate to automatically disclose all information to a parent/carer.

Safeguarding information may also be subject to restrictions or exemptions.

30. Correcting Information

Parents/carers, staff and others should inform Kids Adventure Days where relevant personal information is inaccurate or out of date.

Kids Adventure Days will take reasonable steps to correct inaccurate information.

Families are particularly encouraged to keep current:

- Telephone numbers.
- Addresses.
- Emergency contacts.
- Medical information.
- Allergy information.
- Authorised collection information.

31. Withdrawal of Consent

Where processing is based on consent, the individual may withdraw that consent.

Withdrawal will not make processing that occurred lawfully before withdrawal unlawful.

Some information may continue to be processed where Kids Adventure Days has another lawful basis or legal obligation.

32. Personal Data Breaches

A personal-data breach may include:

- Lost paperwork.
- Lost or stolen devices.
- Email sent to the wrong recipient.
- Unauthorised access.
- Accidental publication.
- Loss of children's photographs.
- Disclosure of confidential information.

- Cybersecurity incidents.

Staff must report suspected personal-data breaches to management immediately.

33. Responding to a Data Breach

When a breach is reported, Kids Adventure Days will:

1. Take steps to contain the incident.
2. Establish what information is affected.
3. Identify individuals affected.
4. Assess potential risks.
5. Record the breach.
6. Take remedial action.
7. Determine whether the ICO must be notified.
8. Determine whether affected individuals must be informed.

Where notification to the ICO is legally required, it will be made within the applicable statutory timeframe.

34. Data Breach Records

Kids Adventure Days will maintain appropriate records of personal-data breaches, including relevant decisions concerning notification.

Lessons from breaches will be used to improve security arrangements.

35. Data Processors and Suppliers

Where another organisation processes personal information on behalf of Kids Adventure Days, we will take reasonable steps to ensure appropriate data-protection arrangements exist.

Relevant supplier arrangements may address:

- Confidentiality.
- Security.
- Use of information.
- Data breaches.
- Sub-processors.
- Return or deletion of information.

- Other applicable data-protection obligations.

36. International Data Transfers

Some technology or cloud-service providers may process information outside the UK.

Where this occurs, Kids Adventure Days will take reasonable steps to ensure an appropriate lawful mechanism and safeguards apply where required.

37. Artificial Intelligence

Staff must not upload confidential or identifiable information concerning children, families or staff into public artificial-intelligence services unless Kids Adventure Days has specifically approved an appropriate and lawful business use.

This includes:

- Children's photographs.
- Safeguarding records.
- Medical information.
- Names combined with sensitive information.
- Confidential staff information.

Any approved AI use must comply with data-protection and safeguarding requirements.

38. Data Protection by Design

When introducing a new system or process involving personal information, Kids Adventure Days will consider privacy and security from the outset.

This may include considering:

- What information is genuinely necessary.
- Who requires access.
- How information will be protected.
- How long it will be retained.
- Whether children are particularly affected.
- Whether a formal data-protection impact assessment may be required.

39. Data Protection Impact Assessments

Where processing is likely to create a high risk to individuals' rights and freedoms, Kids Adventure Days will consider whether a Data Protection Impact Assessment (DPIA) is required.

This may be particularly relevant to significant new technology or large-scale processing involving sensitive information.

40. Complaints About Personal Information

Anyone concerned about how Kids Adventure Days has handled their personal information should initially contact:

Support@kidsadventuredays.com

We will aim to investigate and respond appropriately.

Individuals may also have the right to complain to the Information Commissioner's Office.

41. Information Commissioner's Office

Information Commissioner's Office (ICO)

Telephone: 0303 123 1113

Further information about data-protection rights and complaints is available from the ICO.

42. Staff Responsibilities

All staff must:

- Keep personal information confidential.
- Follow Kids Adventure Days policies.
- Only access information required for their role.
- Use authorised systems.
- Protect passwords.
- Report data breaches.
- Avoid discussing confidential information in inappropriate locations.
- Secure paperwork and devices.
- Follow safeguarding information-sharing requirements.

Serious misuse of personal information may be treated as a staff-conduct and/or safeguarding matter.

43. Training

Relevant staff will receive appropriate information about:

- Confidentiality.
- Secure handling of records.
- Safeguarding information sharing.
- Photography.
- Data breaches.
- Personal devices.
- Subject access requests.
- Cybersecurity awareness.

44. Links With Other Policies

This policy should be read alongside:

- Safeguarding & Child Protection Policy.
- Online Safety Policy.
- Photography & Image Sharing Policy.
- Safer Recruitment Policy.
- Whistleblowing Policy & Staff Code of Conduct.
- Complaints Policy.
- Health & Safety Policy.

45. Policy Review

This policy will be reviewed at least annually, or sooner where:

- Data-protection legislation or regulatory guidance changes.
- Kids Adventure Days introduces a significant new system, technology or method of processing personal information.
- A significant personal-data breach occurs.
- Booking, payment, cloud-storage or other data-processing providers change.
- Kids Adventure Days changes how children's or families' personal information is collected, stored, shared or used.
- Kids Adventure Days begins processing new categories of sensitive information.

- Kids Adventure Days expands into new services, settings or age groups.
- A Data Protection Impact Assessment identifies a need to change existing arrangements.
- The Information Commissioner's Office or another relevant regulatory body recommends changes.
- An internal review identifies weaknesses in existing data-protection arrangements.

Significant changes will be communicated to relevant staff and, where appropriate, parents/carers.

Privacy information provided through the Kids Adventure Days website, booking systems and other services will also be reviewed when our processing activities change.