

## Confidentiality / Privacy / GDPR Policy

### 1. Introduction

SAC takes bookings for Holiday time adventurous childcare from parents and from county/city councils

It is our intention to respect the privacy of children and their parents and carers, whilst ensuring that they access high quality early years care and education in our setting. We are fully committed to protecting the rights and privacy of individuals, in accordance with the Data Protection Act 1998/ GDPR .

Information about our staff and clients will only be processed in line with established regulations. Personal data ( including medical information and attendance) is collected, recorded and used fairly, stored safely and securely via online **booking systems**. Personal data will not be disclosed to any third party unlawfully.

The lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence.

### 2. Aim

We aim to ensure that all parents and carers can share their information in the confidence that it will only be used to enhance the welfare of their children. We meet the requirements of the Human Rights Act 1998 with regard to protecting the individual's rights to a private and family life, home and correspondence. Our only justification to interfering with this right is where we believe that a child may be at risk of significant harm, to prevent a crime or disorder. We meet the requirements of the Data Protection Act 1998 with regard to the information we gather from or about families, how we gather it, store it and use it. Our procedures enable us to meet these requirements and we are committed to:

- protecting staff and customers personal details, records and assessment outcomes
- keeping staff and customers personal data up to date and confidential
- maintaining personal data only for the time period required
- releasing personal data only to authorised individuals/parties and not unless permission is given to do so
- collecting accurate and relevant data only for specified lawful purposes
- adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of E3Adventures are fully aware of and abide by their duties under the Data Protection Act 1998 / GDPR.

### 3. Data Collection

We only collect information that is needed to in order to provide a safe childcare experience:

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- where the childcare place is funded by a county/city council we collect the information that is required by them and use the booking system they designate.
- Where the childcare place is funded by parents we collect the same information that the county/city council require for their bookings.

Information that is collected and stored on the booking system includes:

- registration and admission details, consents, and correspondence concerning the child or family, an ongoing record of relevant contact with parents, and observations by staff on any confidential matter involving the child, such as developmental concerns or child protection matters, incident and accident logs, care plans, behaviour plans etc
- These confidential records are stored online on the **booking system**
- Parents have access to the records of their own children but do not have access to information about any other child
- Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child's needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent. Through the process of booking with us we gain consent from the school/organisation to collect and hold this information, for the purposes described, in the way described. If you are unhappy with the information that we collect or the way we collect and manage it please contact the school/organisation that have booked with us in the first instance.
- Contract. We ask for this information from schools/organisations in order to effectively and efficiently fulfil the contract to deliver safe and effective management of participants on Adventurous Activities.
- We have a legal obligation to ensure that we appropriately deliver our higher duty of care to those in our charge, knowing their name and relevant medical / behavioural history is vital to this. In certain circumstances being able to identify participants without input from a 3<sup>rd</sup> party ( for example a school teacher) is also important in the exercise of that duty.

#### 4. Data Sharing

We have regard to the Common Law Duty of Confidentiality and only share information with other professionals or agencies on a 'need to know' basis, with consent from parents, or without their consent in specified circumstances to do with safeguarding children. These are when:

- There are concerns a child is or may be suffering significant harm
- The 'reasonable cause to believe' a child is or may be suffering significant harm is not clear
- There are concerns about 'serious harm to adults' (such as domestic violence or other matters affecting the welfare of parents). We explain to families about our

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duty to share information for the above reasons. Where we have concerns, we would normally gain consent from families to share. This does not have to be in writing, but we record in the child's file that we have gained verbal consent as a result of discussing a concern that we need to refer to a social care agency.

We do not seek consent from parents to share information where we believe that a child, or sometimes a vulnerable adult, may be endangered by seeking to gain consent. For example, where we have cause to believe a parent may try to cover up abuse, or threaten a child. Where we take a decision to share information without consent this is recorded in the child's file and the reason for doing so is clearly stated. Where evidence to support our concerns is not clear we may seek advice from our local Social Care agency or the NSPCC. We only share relevant information that is accurate, factual, non-judgemental and up to date. Other Records Issues to do with the employment of staff, whether paid or unpaid, remain confidential to the people directly involved with making personnel decisions.

## 5. Allegations

Staff and clients are required to report any allegation in relation to the unlawful treatment of personal data to SAC. A complaint should be made in the event that staff or clients feel that records of their personal data have been:

- lost
- obtained through unlawful disclosure or unauthorised access
- recorded inaccurately and/or in a misleading manner
- provided to a third party without permission.

## 6. Actions

Where required, SAC will take appropriate action/corrective measures against unauthorised/unlawful processing, loss, destruction or damage to personal data.

## 7. Storage Limitations

Personal Data (including medical information, attendance, ) may be retained until the child is 21 (18yrs + 3yrs)

**Your data protection rights.** Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** – Information held by us is a record of the information provided to us by the school/organisation, this does not imply that the information provided to us was correct or accurate but just a historical record of what was provided.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. Where this happens we will keep a record of the request and the outcome.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

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- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at [bryn@summeradventurecamp.co.uk](mailto:bryn@summeradventurecamp.co.uk) if you wish to make a request. You can also complain to the ICO if you are unhappy with how we have used your data. ICO website: <https://www.ico.org.uk>

It is ultimately the responsibility of the Camp Manager / Directors, to ensure that this policy is published and accessible to all staff and clients and any relevant third parties.

A copy of this policy is available on our website  
<https://summeradventurecamp.co.uk/privacy-policy>

## DBS Policy

### 1. Introduction

Our DBS policy sets out how we collect, store and handle DBS information on our staff while fully complying with our obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

### 2. Collecting DBS information

- Where appropriate we will accept a certificate that was requested for a previous role, in this instance we will:
- check the applicant's identity matches the details on the certificate
- check the certificate is the right level and type for the role applied for
- <https://www.gov.uk/dbs-check-applicant-criminal-record>

### 3. Rechecking

- A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. It's up to us to decide when a new check is needed. <https://www.gov.uk/dbs-check-applicant-criminal-record> We will only repeat a DBS check if we have information that suggests we need to, this would include a significant period of not working in the sector.

### 4. Storage and access

- Certificate information is kept on our online HR database BambooHR and is accessible by the directors only.

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## 5. Handling

- In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties.
- Where DBS information is requested by clients we will share our DBS policy and the names of staff.
- It is a criminal offence to pass DBS information to anyone who is not entitled to receive it.

## 6. Usage

- Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## Retention

- In order to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits we retain a copy of the certificate on BambooHR for the duration of employment.

## Disposal

- We retain details of our staff, including DBS information for the duration of employment, or for Freelance Staff, while there is still the possibility of staff working for us. (2 years from last employment).
- At the end of this period all information stored will be deleted.

<https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information>

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