GDPR and record keeping
Policy and Procedure

The intention of this policy
Here at Fit 4 Future Foundation, we know how vital it is in creating a safe learning environment for children. Part of this is making sure the information that we hold about them is used properly, shared appropriately and kept safe.
This policy is written in accordance with the General Data Protection Regulation (GDPR) 2018. GDPR provides us with the information on how to handle and store data in order to be compliant.
Recital 38 of the UK GDPR states that:
"Children require specific protection with regard to their personal data as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. Such specific protection should, in particular apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child.
The consent of the holder of parental responsibility should not be necessary in the context of preventive or counselling services offered directly to a child."

Principles at Fit 4 Future Foundation
GDPR condenses the Data Protection Principles into six areas, referred to as the Privacy Principles. They are:

1. You must have a lawful reason for collecting personal data and must do it in a fair and transparent way.
2. You must only use the data for the reason it is initially obtained.
3. You must not collect any more data than is necessary.
4. It has to be accurate and there must be mechanisms in place to keep it up to date.
5. You cannot keep it any longer than needed.
6. You must protect the personal data.

These privacy principles are supported by a further principle – accountability.
This means that we must not only do the right thing with data but must also show that all the correct measures are in place to demonstrate how compliance is achieved.
All of our staff are trained on data protection and procedures are thoroughly discussed at the induction stage.

Categories of Information we collect, process, hold and share

- Personal information such as name, date of birth, gender, address and contact information
- Emergency contact and family information such as names, relationship, phone numbers and email addresses
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance details (such as sessions attended, number of absences and reasons for absence)
- Assessment information
- Safeguarding information
- Special educational needs information
- Relevant medical information
- Dietary Requirements

Records must be easily accessible and available.
Confidential information and records about staff and children are held securely and only accessible and available to those who have a right or professional need to see them. We are aware of their responsibilities under the Data Protection Legislation and, where relevant, the Freedom of Information Act 2000.
We ensure that all staff understand the need to protect the privacy of the children in their care, as well the legal requirements that exist to ensure that information relating to the child is handled in a way that ensures confidentiality. Parents and/or carers must be given access to all records about their child, provided that no relevant exemptions apply to their disclosure under the Data Protection Act.

Whilst the majority of information that is provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform parents whether they are required to provide certain child information to us or if they have a choice in this.
It is important that the personal information we hold about their child is accurate and current.

We hold data and use it for

- Providing safe and care childcare services, and monitoring attendance and educational needs
- Safeguarding children's welfare and providing appropriate pastoral (and where necessary medical) care
- Support learning and wellbeing
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care

Sharing of data
There are strict controls on who can see children's information. We will not share data if a parent have advised us not to unless we are legally required to do so.
We share information with:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Ofsted
- NHS
- Welfare services (such as social services)
- Law enforcement officials such as police
- Local Authority Designated Officer
- The Local Authority

Data retention

- Children's booking records: 1 year from the date of admission
- Children's records electronic details: until the child turns 25
- Attendance registers: 3 years from the date of entry
- SEN files, reviews and individual education plans (this includes any statement, and all advice and information shared regarding educational needs): until the child turns 25.
- Accident logs – Adults: 6 years from the date of the incident and Children: when the child attains 25 years of age.

Our procedures

- It is the responsibility of the Operations Manager to oversee and control the data handling on site.
- Fit 4 Future Foundation also has a central data protection officer who is an appointed an individual that takes the lead on all central data compliance, advising and training the network accordingly.
- When we collect any data regarding a child at the booking stage, parents are made aware of the privacy notice which informs parents how data is used, who we might need to share it with, how long we will keep it as well as information on consent and complaint.
- We provide legitimate reason for processing any personal data. Parents have to actively opt-in to give consent before any data can be processed.
- We know that we are obliged to have written arrangements with staff processing data for children. We ensure that anyone processing data meet GDPR requirements.
- If there is a breach notification, we know that we are obligated to notify the Information Commissioner's Office (ICO) of a data breach within 72 hours of becoming aware of the breach.

Storing data

- Personal data will be stored in a secure and safe manner remaining at the Charity's registered office at all times. This will be in a secure, locked filing cabinet.

- Electronic data will be protected by a password and firewall systems operated by Fit 4 Future Foundation. Computer workstations are positioned in the office.
- Management and staff using any online Fit 4 Future Foundation systems will remain conscious of casual observers.
- Manual data will be stored where it is not accessible to anyone who does not have a legitimate reason to view or process that data.
- Staff do not carry data on memory sticks or other removable data access files.
- Particular attention will be paid to the need for security of sensitive personal data.
- Strict checks are applied to determine the length of time information is held.

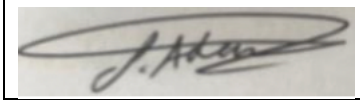
We will:

- back up important information regularly
- use passwords to control access to computers and information
- protect devices from viruses and malware
- deal with suspicious messages (phishing attacks)
- ensure all data is held securely

Data Protection Officer (DPO) Data Protection Officer

Ade Osilowo – info@fit4futurefoundation.org / 0203 802 6909

DPO is responsible for overseeing this Data Protection Policy and developing data-related policies and guidelines.
Please contact the DPO with any questions about the operation of this Data Protection Policy or the UK GDPR or if you have any concerns that this policy is not being or has not been followed.

This policy was adopted by Fit 4 Future Foundation on 3/03/2025. All staff have signed to confirm they have read and understood this policy during their induction process and will act in accordance with this policy.		
Signed by Chair of Trustees: 	**Signed by Operations Manager:** **STACEY HOWE**	