

## Data Protection and Confidentiality Policy

At Elite SF, we recognise that we hold sensitive and confidential information about children and their families, and the coaches on session.

This information is used to meet children's needs, for registers, invoices, and emergency contacts. We store all records in a locked cabinet or on the office computer with files that are password protected, in line with data protection principles.

Any information shared with the staff team is done on a '**need to know**' basis and treated in confidence. This policy works alongside the **GDPR privacy notice** to ensure compliance under the **General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR)** and the **Data Protection Act 2018**.

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## Legal Requirements

- We follow the legal requirements set out in the **Statutory Framework for the Voluntary Ofsted Register** accompanying regulations about the information we must hold about registered children, their families, and coaches working at Elite SF.
  - We follow the requirements of the **General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR)**, **Data Protection Act 2018**, and the **Freedom of Information Act 2000** with regard to the storage of data and access to it.
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## Procedures

It is our intention to respect the privacy of children and their families, and we do so by:

- Storing confidential records in a locked filing cabinet or on the office computer with files that are password protected.
- Ensuring Coach, student, and volunteer inductions include an awareness of the importance of protecting children's privacy as well as the legal requirements that ensure information relating to a child is handled confidentially.
  - This includes ensuring that information about the child and family is not shared outside Elite SF except with relevant professionals who need to know.
  - It is not shared with friends, family, or part of social discussions outside of the setting.

- Any breach of confidentiality may result in breach of contract action or, in serious cases no longer working at Elite SF.
- Students on placement are advised of this policy and required to respect it.
- Ensuring all coaches, volunteers, and students understand that information about children and families is confidential and only used at Elite SF to support the child's best interests with parental permission.
- Ensuring parents have access to files and records of their own children but not to those of any other child, unless relevant professionals (e.g., police or local authority children's social care) decide otherwise.
- Ensuring coaches do not discuss personal information given by parents with other coaches, except where it affects planning for the child's needs.
- Ensuring coaches, students, and volunteers are aware of and follow our **Social Networking Policy** regarding confidentiality.
- Ensuring issues concerning the work of coaches remain confidential to those directly involved in personnel decisions.
- Ensuring any concerns or evidence relating to a child's personal safety are kept in a secure, confidential file and shared with as few people as possible on a **'need-to-know'** basis.
  - If a child is considered at risk, our **Safeguarding Children and Child Protection Policy** will override confidentiality.

All of the above undertakings are subject to the paramount commitment Elite SF: the **safety and well-being of the child**.

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### **General Data Protection Regulation (GDPR) Compliance**

To meet GDPR requirements, we will also:

- Ensure terms and conditions, privacy, and consent notices are easily accessed and written in accurate, easy-to-understand language.
- Use personal data to ensure safe, operational, and regulatory requirements of running Elite SF, including personal information such as National Insurance numbers for funding.
  - Personal data will **only** be used for Elite SF operational purposes, not for other purposes.

- Further details can be found in the **GDPR privacy notice**.
- Ensure everyone at Elite SF understands that people have the right to access their records or have them amended or deleted (subject to other laws and regulations).
- Ensure coaches have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided in the **Data Protection Act 2018** and **GDPR**, including:
  - Being confident in the processing conditions which allow storing and sharing information for safeguarding purposes, including information considered '**special category personal data**'.
  - Understanding that '**safeguarding of children and individuals at risk**' is a processing condition that allows practitioners to share special category personal data without consent when necessary to enhance child safeguarding in a timely manner.

### **Coach and Volunteer Information**

- All information and records relating to coach and volunteers will be kept confidentially within **Brighthr**.
- Individual coaches may request to see their own personal file at any time.

### **Policy Review**

This policy is updated at least annually in consultation with staff and parents, or after a serious incident.

**Adopted on:** 29<sup>th</sup> December 2025

**Signed on behalf of the nursery:** J. Bartram

**Date for review:** 29<sup>th</sup> December 2026