



TURNING HEADS SATURDAY CLUB

PRIVACY & DATA PROTECTION POLICY

Setting: Turning Heads Skills Centre, Windsor House, Lime Avenue, Torquay, TQ2 5JL

Service: Turning Heads Saturday Club

Policy Owner: Colette Palmer – Saturday Club Leader / DSL

Review Date: 2nd September 2027

1. Our Commitment to Privacy

At Turning Heads, we take the privacy and security of the information we hold about young people, parents/carers, staff and other individuals seriously.

We collect and use personal information only when we have a legitimate reason to do so and in accordance with applicable **UK data protection legislation, including the UK GDPR and Data Protection Act 2018.**

We aim to be open and transparent about what information we collect, why we need it and how we keep it safe.

2. Information We May Collect

Depending on the circumstances, we may collect information such as:

- Young person's name, date of birth and contact details
- Parent/carer names and contact details
- Emergency contact information
- Information about SEND and individual support needs
- Relevant medical, allergy or dietary information
- Attendance information
- Consent information
- Accident, incident or safeguarding information
- Photographs or videos where appropriate consent has been provided
- Information required to arrange funding or support

We only collect information that is necessary for the safe and effective running of the Saturday Club.

3. How We Use Information

We may use personal information to:

- Keep young people safe
- Provide appropriate support and reasonable adjustments
- Contact parents/carers when necessary
- Manage attendance and bookings
- Respond to accidents, incidents or safeguarding concerns
- Arrange or administer funding
- Meet our legal and regulatory responsibilities
- Communicate important information about the Saturday Club
- Improve the service we provide

Where we need to use information for another purpose, we will consider whether this is lawful and appropriate before doing so.

4. Keeping Information Safe

We take appropriate steps to protect personal information from:

- Unauthorised access
- Loss
- Accidental disclosure
- Unauthorised alteration
- Unauthorised use

Confidential information is only made available to people who have a legitimate reason to access it.

Individual records, risk assessments and safeguarding information are treated as **confidential** and are not published on our website.

5. Sharing Information

We will not routinely share personal information with other organisations without a lawful basis for doing so.

Information may need to be shared where necessary to:

- Protect a young person from harm
- Respond to a safeguarding concern
- Meet a legal or regulatory requirement
- Provide appropriate support
- Administer or verify funding
- Respond to an emergency

Where information is shared, we will only share information that is necessary and appropriate.

6. Photographs, Videos & Social Media

We may take photographs or videos of activities at Turning Heads.

We will seek appropriate consent before using photographs or videos for purposes such as our website, social media or promotional material.

Parents/carers can choose whether to provide this consent.

Our **Photography, Video & Social Media Policy** provides further information.

7. Children's Privacy

We recognise that young people have privacy rights of their own.

We aim to explain the use of personal information in a way that is understandable and appropriate to the age and understanding of the young person.

We encourage young people to ask questions about how their information is used.

8. How Long We Keep Information

We only keep personal information for as long as it is necessary, taking account of our legal, regulatory, safeguarding and operational responsibilities.

Different types of records may need to be retained for different periods.

When information is no longer required, it will be securely deleted or destroyed.

9. Your Rights

Under data protection law, individuals have rights concerning their personal information.

Depending on the circumstances, these may include the right to:

- Ask what personal information we hold
- Request access to personal information
- Ask for inaccurate information to be corrected
- Ask for information to be deleted where applicable
- Object to certain uses of information
- Request restriction of processing in certain circumstances

Some rights are subject to legal exemptions and limitations.

10. Questions or Concerns

If you have any questions about how Turning Heads collects or uses personal information, or you have a concern about privacy or data protection, please contact:

Colette Palmer

Saturday Club Leader / DSL

Telephone: 07790 930938

If you remain concerned about the way your personal information has been handled, you can contact the **Information Commissioner's Office (ICO)**.

11. Policy Review

This policy will be reviewed regularly and updated when necessary to reflect changes in legislation, guidance or our practices.

Policy reviewed: 3rd September 2026

Next review: 2nd September 2027

Signed: 

Name: Colette Palmer

Position: Saturday Club Leader / DSL