

Born to Spa | Data Protection Policy

Contents of this policy:

- Introduction
- Information Requested
- Subject Access
- Data Storage
- Information Sharing
- Record Keeping
- Suspected Data Breach

Introduction

Born to Spa adheres to all current guidance and legislation including the General Data Protection Regulations Act 2018, regarding the sharing of information on and with children, parents, families, staff, volunteers and visitors.

Information Requested

In order to provide safe, age-appropriate classes and comply with legislation, Born to Spa will need to request information from parents about their child and family. Some of this will be personal data.

The data that is needed by Born to Spa is as follows:

- Name of baby and parent and any additional adult who attends the class.
- Baby's date of birth (to ensure they are within the age parameters of the class).
- Parent's email address and phone number (in case parents need to be informed of a class being cancelled or rescheduled or to confirm their's or they baby's details).
- If any adults or babies in attendance have any medical issues that are relevant to the class, e.g. allergies, intolerances

Born to Spa's website host and booking platform requires the following information:

- Payment details (not accessible to Born to Spa)
- Banking Address (accessible to Born to Spa but not needed or used by us)
- Name and Email address for eGift Voucher recipients (accessible to Born to Spa but not needed or used by us)

At Born to Spa we take families' privacy seriously, and in accordance with the General Data Protection Regulation (GDPR), we will process any personal data according to the six principles below:

1. If there is a lawful reason for collecting personal data, an employee of Born to Spa will do it in a fair and transparent way. The employee will be clear about what data need to be collected and why.
2. Born to Spa staff must only use the data for the reason it is initially obtained. This means that a person's data may not be used to market a product or service to them that is unconnected to the reasons for which they shared the data with us in the first place.
3. Born to Spa will not collect any more data than is necessary. We will only collect the data we need to hold in order to provide the service for which we have collected the data.
4. Personal information provided will be checked prior to the start of classes and if there is any uncertainty regarding the age of a child, or health of a child or adult that has booked onto one of our services, the adult who made the booking will be contacted for clarification.

Unless it is a child protection issue, we expect the parents and carers of children attending Born to Spa's classes to withdraw from sharing any private and confidential or sensitive information they may accidentally learn about our staff or other children and families in attendance.

Subject Access

The only personal information that is accessible to Born to Spa is given by the person booking (usually the parent). The information that is provided to us is given voluntarily.

Data Storage

To protect personal data at Born to Spa, data will only be kept electronically on our booking platform for which Born to Spa's owner (and sole class leader) has sole access to by password protection. No paper-based records will be made.

In Born to Spa's Terms and Conditions, it states that it will be assumed that any photographs sent to our email address (hello@borntospa.co.uk) by parents or having been 'tagged' and therefore linked to Born to Spa's social media pages, may be used by Born to Spa for future marketing and advertising campaigns. These images may also be stored electronically on a password-protected device.

Information Sharing

Any information shared by parents or carers of the children attending Born to Spa's services will only be disclosed to the Police, or Local Authority in which the family attends the class, if there is a suspected child protection issue.

Record Keeping

All Accidents/Incidents will be recorded on a password protected device owned by Born to Spa and emailed to the parent or carer. In the unlikely event of a serious accident, our Liability insurance company will be notified of any accidents which may result in an insurance claim, e.g. an accident resulting in a doctor or hospital visit.

Our Liability insurance company will then deal with the situation and inform Born to Spa with any actions that need to be taken. Any significant injuries, accidents or deaths will be reported to the local child protection agency and the Health and Safety Executive as soon as possible.

If we are worried about a child's welfare we have a duty of care to contact the NSPCC to inform them. Information will only be shared if it is in a child's best interests to do so and where possible we will discuss concerns with you before making a report.

Suspected Data Breach

If it will be suspect that data has been accessed unlawfully, we will inform the relevant parties immediately and report to the Information Commissioner's Office (ico.org.uk) within 72 hours. We will keep a record of any data breach.

Should Born to Spa be informed of a data breach on our website hosting and booking platform, individuals who are affected will be contacted immediately.

This policy is due for review every 2 Years.

Signed: Anna Madge

Date: 8th November 2023