PRIVACY NOTICE

Targeted and Specialist SEND Short Breaks Provision

James House | 5 Park Street | Fingerpost | St Helens | WA9 1DW

Document title	New Beginnings Privacy Policy
Applies to	Children, young people, parents, carers, families and visitors
Policy owner	Kathryn O'Hara
Operational lead	Manager / most senior person on duty
Approved by	New Beginnings Directors
Effective date	19 October 2026
Version	V1.0
Next review	12 months after approval, or sooner following significant changes
Service	Non-residential SEND Targeted and Specialist short breaks, current age range 8 up to the date of their 18th birthday

Seen. Supported. Understood. Valued.

Contents

1. Purpose and principles
2. Scope of the Privacy Notice
3. Who we are and data protection responsibilities
4. Personal information we collect
5. How we use personal information
6. Lawful bases for processing information
7. Children's information and safeguarding
8. Sharing information with others
9. Storage, security and confidentiality
10. Website enquiries, Google Forms and cookies
11. Photographs and videos
12. Payments and financial information
13. CCTV and premises security
14. Records retention and secure disposal
15. Individual data protection rights
16. Requests to access or correct information
17. Data breaches and reporting
18. Complaints and concerns
19. Privacy Notice Monitoring and Review

1. Purpose and principles

New Beginnings Children's Day Care is committed to protecting the privacy, confidentiality and personal information of the children, young people and families who access our services, as well as visitors to our premises and website.

As a specialist and targeted SEND short breaks provider, we recognise that families trust us with personal and sensitive information about their children. We take this responsibility seriously and are committed to ensuring that all information is collected, used, stored and shared appropriately, securely and in accordance with applicable data protection legislation.

The purpose of this policy is to explain how New Beginnings handles personal information and to ensure that individuals understand their rights in relation to the information we hold about them.

Our approach to data protection is guided by the following principles:

- **Lawfulness, fairness and transparency:** Personal information is processed lawfully, fairly and openly.
- **Purpose limitation:** Information is collected for clear, legitimate purposes and is not used in ways that are incompatible with those purposes.
- **Data minimisation:** We collect only the information necessary to provide appropriate support and fulfil our responsibilities.
- **Accuracy:** We take reasonable steps to ensure personal information is accurate and kept up to date.
- **Storage limitation:** Information is retained only for as long as necessary, taking account of legal, regulatory and safeguarding requirements.
- **Integrity and confidentiality:** Personal information is protected against unauthorised access, loss, misuse or disclosure through appropriate security measures.
- **Accountability:** New Beginnings takes responsibility for demonstrating compliance with its data protection obligations.

We recognise that children's personal information requires particular care, especially where it relates to health, disability, communication, personal care or safeguarding needs.

Our commitment is to handle information respectfully and responsibly while ensuring that the safety, dignity and wellbeing of the children and young people we support remain central to our practice.

2. Scope of the Privacy Notice

This Privacy Notice applies to the collection, use, storage, sharing and disposal of personal information by New Beginnings Group Limited, trading as New Beginnings Children's Day Care.

It covers personal information relating to:

- Children and young people who attend or are being considered for our services.
- Parents, carers, family members and emergency contacts.
- Individuals making enquiries about our services.
- Visitors to James House and users of our website.

- External professionals and other individuals whose information we may process in connection with the support we provide.

The policy applies to information held in both paper and electronic formats, including registration forms, individual support information, assessments, attendance records, correspondence, photographs, CCTV recordings and website enquiries.

It also covers personal information received from parents, carers, local authorities and other relevant professionals where necessary for the provision of our services.

Staff, volunteers and job applicants are covered by a separate Staff and Recruitment Privacy Notice.

All personal information is handled in accordance with applicable data protection legislation and New Beginnings' internal confidentiality, safeguarding and information security procedures.

3. Who we are and data protection responsibilities

New Beginnings Children's Day Care is operated by New Beginnings Group Limited (Company Number: 16083150).

New Beginnings Group is the data controller and is responsible for ensuring personal information is handled in accordance with UK data protection legislation.

Registered Office: 41 Chelford Road, Eccleston Grange, Eccleston, St Helens, WA10 5PL.

Kathryn O'Hara, Director, oversees data protection at New Beginnings. This includes making sure personal information is kept safe, dealing with any questions or concerns and ensuring our procedures are followed.

All staff are expected to maintain confidentiality and handle personal information responsibly, in accordance with our internal policies and procedures.

For any questions, concerns or requests relating to personal information, please contact:

Kathryn O'Hara — Director
Email: hello@newbeginningsgroup.co.uk

4. Personal information we collect

At New Beginnings, we collect information about children, young people and their families so we can understand their needs and provide safe, personalised care and support.

The information we collect may include:

- **Personal details:** Names, dates of birth, addresses and contact details.
- **Parent and carer information:** Contact details, emergency contacts and relevant family information.
- **Health and medical information:** Disabilities, diagnoses, allergies, medication and personal care needs.
- **Individual support needs:** Communication, sensory needs, behaviours, interests and relevant information from Education, Health and Care Plans (EHCPs).
- **Care and attendance records:** Registration forms, assessments, care plans, attendance records, accidents, incidents and safeguarding concerns.
- **Financial information:** Payment details, invoices and funding arrangements.

- **Photographs and videos:** Images taken during activities, where appropriate.
- **Website enquiries:** Information provided when someone contacts us through our website.
- **CCTV footage:** Recordings from cameras in designated areas of our building.

We collect information directly from parents and carers, through our registration forms and during the time children spend with us. We may also receive relevant information from other professionals involved in a child's care.

We only collect information that we need to provide our services and keep children safe.

5. How we use personal information

At New Beginnings, we use personal information to provide safe, personalised care and support to children and young people, while keeping in touch with their families.

We use this information to:

- Respond to enquiries and communicate with parents and carers.
- Understand each child's needs and plan the right support for them.
- Manage registrations, bookings and attendance.
- Support children's health, wellbeing and safety.
- Create and maintain care plans and risk assessments.
- Record and respond to accidents, incidents and safeguarding concerns.
- Manage invoices, payments and funding arrangements.
- Keep our building safe and secure.
- Meet our legal and regulatory responsibilities.
- Keep parents and carers updated about their child's day through messages, photographs and conversations when they collect their child.

Staff only have access to children's personal information when it is relevant to their role and the care or support they are providing.

We only use personal information for the reasons explained in this notice, unless there is a lawful reason to use it for something else.

6. Lawful bases for processing information

New Beginnings follows the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We only collect and use personal information when we have a lawful reason to do so. These reasons include:

- **Providing our services:** We need certain information to arrange bookings, manage registrations and provide agreed care and support.
- **Meeting legal responsibilities:** We sometimes need to collect, keep or share information to meet legal requirements, including safeguarding.

- **Running our service safely:** We use information to respond to enquiries, manage our service and help keep our building safe.
- **Consent:** We ask for permission when required, such as using children's photographs or videos on our website or social media.

Health and other sensitive information

We collect information about children's health, disabilities and individual support needs so we can provide safe, personalised care.

Before offering a child a place, we ask parents and carers questions about their child's needs and consider their Education, Health and Care Plan (EHCP), where they have one.

This helps us understand the support each child needs, assess their support banding and make sure the right care and staffing arrangements are in place.

We take extra care when handling children's health and medical information because of how personal and sensitive it is.

Data protection law requires us to have an additional legal reason for using this information. For certain health and social care purposes, this may be covered by Article 9(2)(h) of UK GDPR and Schedule 1, paragraph 2 of the Data Protection Act 2018, where the requirements are met.

We only share this information with staff and professionals who need it to support the child safely or meet our legal responsibilities.

Where we rely on consent, it can be withdrawn at any time. This does not affect anything we have already done lawfully.

7. Children's information and safeguarding

At New Beginnings, we take children's privacy and safety seriously, especially when handling information about their health, disabilities and individual support needs.

We collect and use this information to understand each child's needs, provide the right support and help keep them safe.

Only staff who need access to a child's personal information to carry out their responsibilities are allowed to see it.

Our Designated Safeguarding Leads (DSLs) are:

- **Kathryn O'Hara – Director**
- **Michelle Welburn – Manager**
- **Olivia Stocks – Deputy Manager**

If we have concerns about a child's safety or wellbeing, we may need to share relevant information with children's social care, local authorities, emergency services or other professionals involved in keeping them safe.

In some situations, we may need to share information without parental consent, particularly where a child may be at risk of harm.

We only share information when there is a lawful reason to do so and follow our Safeguarding Policy when handling these concerns.

8. Sharing information with others

At New Beginnings, we respect the privacy of children and their families. We only share personal information when there is a genuine need and a lawful reason to do so.

Depending on the situation, we may share relevant information with:

- **Local authorities and social workers:** When needed to support a child or respond to safeguarding concerns.
- **Health and education professionals:** When information is needed to support a child's care, safety or wellbeing.
- **Emergency services:** If information is needed to protect someone's health or safety.
- **Professional service providers:** Such as our IT support and accountants, where they need information to provide their services.
- **Technology providers:** Such as Wix, Google and our CCTV provider, where their systems are used to collect or store information.
- **Regulators and legal authorities:** Such as Ofsted or the police, where information needs to be shared for legal or regulatory reasons.

We only share the information that is needed and take care to keep it secure.

Where other organisations handle personal information on our behalf, we make sure appropriate data protection arrangements are in place.

We never sell personal information or share it with other organisations for their own marketing.

Some of the technology services we use may store or access information outside the UK. Where this happens, we make sure appropriate safeguards are in place to protect it.

9. Storage, security and confidentiality

At New Beginnings, we take care to keep personal information safe and protect it from being lost, misused or accessed by anyone who shouldn't see it.

We have measures in place to protect the information we hold:

- **Paper records:** Kept in locked filing cabinets, with access limited to authorised staff.
- **Electronic records:** Stored on password-protected computers and systems.
- **IT security:** Our systems have automatic backups to help protect information if something goes wrong. E2E Technologies provides technical support when needed, with permission required before they can remotely access our computers.
- **Access to information:** Staff only have access to information they need for their role and the children they are supporting.
- **Confidentiality:** All staff sign confidentiality and data protection agreements when they join New Beginnings.
- **Secure disposal:** Information is securely deleted or destroyed when it is no longer needed, in line with our record-keeping requirements.

If we become aware that personal information has been lost, accessed or shared incorrectly, we take steps to address the issue and protect those affected.

Any concerns about the security of personal information are handled in line with our Data Breach Procedure.

10. Website enquiries, Google Forms and cookies

New Beginnings collects personal information through our website and online forms so we can respond to enquiries, manage registrations and arrange care and support.

Our website is built using Wix, and we use Google Forms to collect information from parents and carers, including registration details, consent forms and information about children's individual needs.

Only authorised individuals can access this information, and we take steps to keep it safe and private.

Cookies

Our website uses cookies to help it work properly and keep it secure. Some cookies may also help us understand how visitors use our website.

Where required, visitors will be given the choice to accept or reject optional cookies.

We only keep information collected through our website and online forms for as long as it is needed.

11. Photographs and videos

New Beginnings may take photographs and videos during activities to record children's experiences, achievements and participation.

We recognise the importance of protecting children's privacy and dignity when capturing, storing and using images.

- **Parental consent:** Identifiable photographs and videos will only be used for promotional purposes, including our website and social media, where appropriate consent has been obtained.
- **Children's wishes:** We will respect children's preferences and consider their communication needs when deciding whether photographs or videos should be taken or used.
- **Secure storage:** Photographs and videos will be stored securely, with access limited to authorised staff.
- **Appropriate use:** Images will only be used for the purposes for which they were collected and will not be shared unnecessarily.
- **Withdrawal of consent:** Parents and carers may withdraw consent for promotional use at any time. New Beginnings will stop future use and take reasonable steps to remove previously published images from platforms under our control.

12. Payments and financial information

At New Beginnings, we collect and keep financial information so we can manage payments, invoices and funding arrangements.

This may include:

- Parent and carer billing details.
- Invoices and payment records.
- Information about Direct Payments, Personal Budgets and private payments.

Payments are made directly to New Beginnings by bank transfer. We do not collect or store parents' or carers' bank account details.

We work with Mitchell Charlesworth, who provides our bookkeeping and accounting services. They may have access to relevant financial information when carrying out this work.

We keep financial information secure and only share it when necessary.

Financial records are kept for as long as required by law and are securely disposed of when no longer needed.

13. CCTV and premises security

New Beginnings operates CCTV within designated areas of James House to support the safety and security of children, staff, visitors and the premises.

Our CCTV system is provided by CFS Systems and records video footage only, without audio.

CCTV is managed in accordance with the following arrangements:

- **Purpose:** To support safeguarding, prevent and investigate incidents, and maintain premises security.
- **Camera locations:** Cameras are positioned in designated areas and are not installed in toilets, hygiene facilities, the therapy room or private offices.
- **Signage:** CCTV notices are displayed to inform individuals that recording is taking place.
- **Access:** Recordings are accessed only by authorised individuals where there is a legitimate reason to do so.
- **Storage:** Footage is stored using a cloud-based system, with appropriate security measures.
- **Retention:** Recordings are retained for a maximum of 31 days unless footage needs to be preserved for an investigation, safeguarding concern or legal requirement.

CCTV footage will only be shared with relevant authorities or other appropriate organisations where necessary and lawful.

New Beginnings regularly considers the privacy and dignity of children and young people when operating CCTV, ensuring its use remains necessary and proportionate

14. Records retention and secure disposal

New Beginnings retains personal information only for as long as necessary to provide our services, meet legal and regulatory requirements, and fulfil our safeguarding responsibilities.

Records are retained in accordance with our Records Retention Schedule, taking account of the type of information and the purpose for which it was collected.

Our current retention arrangements include:

Record type	Retention period
Children's care and attendance records	Generally, until the child reaches 25 years of age, subject to any longer applicable requirements

Safeguarding records	In accordance with safeguarding requirements and our Records Retention Schedule
Financial and accounting records	In accordance with applicable financial and tax requirements
CCTV recordings	Maximum of 31 days, unless required for an investigation or legal purpose
Website enquiries and registration information	Only for as long as necessary for the purpose collected, in accordance with our retention arrangements

Where information is no longer required, it is securely disposed of using appropriate methods.

- **Paper records** are securely shredded.
- **Electronic records** are securely deleted from relevant systems, with backup copies managed in accordance with our retention and deletion arrangements.

Records may be retained for longer where necessary for safeguarding, legal proceedings, investigations or other lawful reasons.

15. Individual data protection rights

Under UK data protection legislation, individuals have rights regarding how their personal information is collected, used and stored.

Depending on the circumstances, these rights include:

- **Right to be informed:** To understand how and why personal information is used.
- **Right of access:** To request a copy of personal information held about them.
- **Right to rectification:** To request that inaccurate or incomplete information is corrected.
- **Right to erasure:** To request the deletion of personal information where the law allows.
- **Right to restrict processing:** To request that the use of personal information is limited in certain circumstances.
- **Right to data portability:** To receive certain personal information in a format that allows it to be transferred to another organisation.
- **Right to object:** To object to certain uses of personal information.
- **Rights relating to automated decision-making:** To receive appropriate protections where decisions are made solely through automated processing and have legal or similarly significant effects.

Children and young people have their own data protection rights. Where a parent or carer makes a request on their behalf, we will consider the child's understanding, wishes and best interests, as appropriate.

These rights are not absolute and may be subject to legal exemptions, including where information must be retained for safeguarding or legal reasons.

Anyone wishing to exercise their data protection rights or obtain further information about these rights can contact Kathryn O'Hara, Director, at **k.ohara@newbeginningsgroup.co.uk**.

16. Requests to access or correct information

Individuals have the right to request access to personal information held about them and to ask for inaccurate or incomplete information to be corrected.

Requests can be made verbally or in writing by contacting:

Kathryn O'Hara – Director
Email: k.ohara@newbeginningsgroup.co.uk

New Beginnings will:

- Acknowledge and review requests promptly.
- Verify the identity and authority of the person making the request where necessary.
- **Respond without undue delay:** We will normally respond within one month, in line with data protection law. Some requests may take longer where the law allows, and we will explain any delays..
- Explain where information cannot be provided, corrected or deleted due to legal obligations, safeguarding responsibilities or other applicable exemptions.

Where a request relates to a child or young person, we will consider their rights, understanding and wishes before disclosing information to a parent, carer or representative.

Requests will normally be handled free of charge, although a reasonable fee may apply in limited circumstances permitted by law.

17. Data breaches and reporting

New Beginnings takes all suspected or confirmed personal data breaches seriously and has procedures in place to respond promptly and appropriately.

A personal data breach may involve the loss, accidental disclosure, unauthorised access, alteration or destruction of personal information.

Where a breach is identified, New Beginnings will:

- **Report and record:** Ensure the incident is reported promptly to Kathryn O'Hara, Director, and documented appropriately.
- **Contain the breach:** Take immediate steps to secure information and prevent further unauthorised access or disclosure.
- **Assess the risk:** Consider the potential impact on the individuals affected, particularly children and young people.
- **Notify relevant authorities:** Report breaches to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of them, where legally required.
- **Inform affected individuals:** Notify those affected without undue delay where a breach is likely to result in a high risk to their rights and freedoms.
- **Review and improve:** Investigate the circumstances and implement measures to reduce the likelihood of similar incidents.

All staff are required to report suspected data breaches immediately and follow New Beginnings' Data Breach Procedure.

Not all breaches require notification to the ICO, but all personal data breaches will be assessed and documented in accordance with data protection requirements.

18. Complaints and concerns

New Beginnings is committed to handling concerns and complaints about personal information fairly, promptly and professionally.

Anyone who has concerns about how their personal information, or that of a child or young person, has been collected, used, stored or shared can contact:

Kathryn O'Hara – Director
Email: hello@newbeginningsgroup.co.uk

Where a data protection complaint is received, New Beginnings will:

- Acknowledge the complaint: Confirm receipt without undue delay and within 30 days.
- Keep the individual informed of progress where appropriate.
- Communicate the outcome without undue delay.

Individuals who remain dissatisfied with how their complaint has been handled may raise their concerns with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office (ICO)
Website: www.ico.org.uk
Telephone: 0303 123 1113

Individuals may contact the ICO directly, although we welcome the opportunity to address concerns in the first instance.

19. Privacy Notice Monitoring and Review

New Beginnings is committed to maintaining appropriate data protection standards and ensuring that personal information is handled safely, lawfully and responsibly.

Kathryn O'Hara, Director, is responsible for overseeing the implementation and review of this policy.

This policy will be reviewed annually, or sooner where necessary, to reflect:

- Changes to data protection legislation or regulatory guidance.
- Changes to our services, systems or information-handling practices.
- Findings from data breaches, complaints or internal reviews.
- Improvements identified through ongoing monitoring.

Any significant amendments will be approved by the Directors and communicated to relevant staff.

The latest version of this policy will be made available to parents, carers and other individuals upon request.