

# LITTLE STICKS FOREST SCHOOL

## DATA PROTECTION & PRIVACY POLICY

Compliant with the Data (Use and Access) Act 2025 (DUAA),  
UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and PECR

Document Version: 1.0	Effective Date: 30 June 2026	Review Date: June 2027
-----------------------	------------------------------	------------------------

### 1. INTRODUCTION AND PURPOSE

Little Sticks Forest School ('the School', 'we', 'us' or 'our') is an outstanding Ofsted-registered provider of high-quality outdoor Forest School education and early years care for children aged 24 months and upwards. We operate from two woodland sites in the Wigan area: Aspull (on the grounds of Aspull Rugby Club) and Greenslate Farm, Billinge.

This Data Protection and Privacy Policy explains how we collect, use, store, share and protect personal information. It has been updated to reflect the requirements of the **Data (Use and Access) Act 2025 (DUAA)**, which received Royal Assent on 19 June 2025 and amends the UK GDPR, Data Protection Act 2018 and Privacy and Electronic Communications Regulations (PECR). The DUAA modernises data protection rules to support innovation and economic growth while maintaining strong safeguards for individuals' privacy rights, with particular emphasis on children's data.

We are committed to being transparent, accountable and to upholding the highest standards of data protection, especially when handling the personal data of young children and their families.

### 2. DATA CONTROLLER AND CONTACT DETAILS

Little Sticks Forest School is the Data Controller for the personal data we process. We have appointed a Data Protection Lead who is responsible for overseeing compliance with this policy and data protection legislation.

**Primary Contact for Data Protection Enquiries:**

Email: [info@littlesticksforestschool.co.uk](mailto:info@littlesticksforestschool.co.uk)

Aspull Site: 07817 140080 | Greenslate Farm Site: 07562 944858

Postal: Little Sticks Forest School, Aspull Rugby Club, Woods Road, Aspull, Wigan, WN2 1PJ

Individuals may also contact the Information Commissioner's Office (ICO) directly if they have concerns: [ico.org.uk](http://ico.org.uk) or 0303 123 1113.

### 3. SCOPE OF THIS POLICY

This policy applies to all personal data processed by or on behalf of Little Sticks Forest School, whether in paper or electronic form. It covers data relating to:

- Children enrolled at the School (our primary data subjects)
- Parents, guardians and carers (including emergency contacts)
- Staff, volunteers, students and trainees
- Visitors, contractors and other individuals who interact with the School
- Any other individuals whose data is processed in connection with our activities (e.g. local authority funding teams, health professionals)

### 4. CATEGORIES OF PERSONAL DATA WE PROCESS

We process the minimum personal data necessary to deliver safe, effective and high-quality Forest School provision. The main categories include:

Category	Examples of Data	Special Category?
Identity & Contact	Full name, date of birth, address, telephone numbers, email addresses, photographs	No (generally)
Family & Emergency	Parent/guardian details, emergency contacts, family circumstances, court orders	Sometimes
Health & Medical	Medical conditions, allergies, medications, immunisation status, disabilities, dietary requirements	<b>Yes</b>
Special Educational Needs & Safeguarding	SEN support plans, EHCPs, safeguarding concerns, child protection records, social care involvement	<b>Yes</b>
Educational Records	Observations, learning journals, assessments, progress records, photographs and videos of activities, attendance	No (but sensitive)
Staff & Volunteers	Application forms, references, DBS certificates, qualifications, payroll/bank details, performance records	Yes (DBS, health)
Website / Communications	Contact form submissions, newsletter subscriptions, consent preferences, IP addresses / cookies (where applicable)	No

## 5. LAWFUL BASES FOR PROCESSING

We only process personal data where we have a valid lawful basis under Article 6 of the UK GDPR (as amended by the DUAA). The bases we most commonly rely on are:

- **Consent** (Art 6(1)(a)): Obtained for photographs, videos, certain sharing of learning records, marketing/newsletters, and specific optional activities. Consent can be withdrawn at any time. For children, we seek parental consent and, where appropriate, involve the child.
- **Contract** (Art 6(1)(b)): Necessary for the performance of our parent/carer contract (enrolment, provision of care and education, billing where applicable).
- **Legal Obligation** (Art 6(1)(c)): Compliance with statutory duties including safeguarding, health & safety, Ofsted registration, early years funding claims, employment law, and DBS requirements.
- **Vital Interests** (Art 6(1)(d)): Protecting someone's life or preventing serious harm (e.g. medical emergencies).
- **Legitimate Interests** (Art 6(1)(f)): Our core operational interests (delivering high-quality education, maintaining records, improving services) where these are not overridden by the individual's rights. We conduct balancing tests where required.
- **Recognised Legitimate Interests** (new under DUAA): For specified purposes including safeguarding children, preventing crime, responding to emergencies, and other recognised interests. This new ground (introduced by the DUAA) removes the need for a balancing test in defined circumstances, giving us greater confidence to act quickly to protect children.

Where we process **special category data** (health, safeguarding, etc.), we also identify a condition under Article 9 UK GDPR (e.g. explicit consent, vital interests, substantial public interest, or employment/social security obligations).

## 6. CHILDREN'S DATA AND HIGHER PROTECTIONS (DUAA REQUIREMENTS)

The DUAA strengthens protections for children's personal data. It explicitly recognises that *children merit specific protection with regard to their personal data because they may be less aware of the risks and consequences associated with the processing of personal data and of their rights in relation to such processing.*

When designing or using any processes, systems or services that involve children's personal data (including digital learning journals, parent portals, observation tools, or our website), we take account of 'children's higher protection matters' as required by the DUAA amendments to Article 25 UK GDPR (data protection by design and by default).

Where relevant, we have regard to the ICO's Age Appropriate Design Code (AADC). We minimise data collection, use child-friendly language in communications, provide clear privacy information to parents, and ensure that any digital tools we use are configured to the highest privacy settings by default.

We carefully consider the best interests of each child when making decisions about their data. Parents/guardians are the primary point of contact for consent and rights exercise on behalf of children under 13 (or older where appropriate). We support children to understand and, where suitable, participate in decisions about their own data.

## 7. HOW WE COLLECT PERSONAL DATA

We collect personal data directly from parents/carers via registration and consent forms (paper and/or secure online), through conversations and meetings, and during the child's time with us through observations and activities. We may also receive information from previous settings, health visitors, local authorities (for funded places), or other professionals with appropriate consent or legal authority.

Photographs and short videos are a key part of Forest School practice for capturing 'in the moment' learning, documenting progress, and creating individual learning journals. These are only taken and used with appropriate consent and in line with our separate Photography & Image Use Policy.

## 8. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

- Providing high-quality, safe and inclusive Forest School education and early years care tailored to each child's needs
- Communicating effectively with parents/carers about their child's day, progress, events, closures and emergencies
- Creating and maintaining accurate learning records, observations and portfolios (often shared securely with parents)
- Meeting statutory safeguarding, child protection and welfare requirements
- Managing health, medical and dietary needs safely
- Administering funded places, claiming early years funding and submitting required returns to local authorities and DfE
- Recruiting, managing and supporting staff and volunteers (including DBS and safer recruitment)
- Complying with health & safety, insurance, employment and other legal obligations
- Improving our provision through evaluation and (anonymised where possible) research
- Marketing and promoting the School (only with consent and never using children's images without specific permission)

## 9. DATA SHARING AND DISCLOSURES

We do not sell or rent personal data. We only share personal data where there is a lawful basis and it is necessary and proportionate. Typical recipients include:

- Parents/carers (access to their own child's records and learning journals)
- Local authorities and DfE (funding claims, statutory data returns, safeguarding)
- Ofsted (during inspections and regulatory activities)
- Health and social care professionals (with consent or under legal powers, e.g. NHS, social workers)
- Other early years/school settings (transition information with consent)
- Secure digital platforms used for learning documentation (e.g. approved observation apps that are UK GDPR and DUAA compliant)

- Emergency services and police (where necessary to protect vital interests or prevent crime)
- Professional advisors (e.g. legal, insurance) under confidentiality obligations

Where we use third-party processors (e.g. cloud storage, digital journals, payroll), we have appropriate contracts in place (Data Processing Agreements) and carry out due diligence on their security and compliance.

## 10. INTERNATIONAL DATA TRANSFERS

We aim to keep personal data within the UK. Where we use cloud-based services or tools that may involve transfers outside the UK, we ensure appropriate safeguards are in place in accordance with UK GDPR Chapter V, as simplified and clarified by the DUAA. This may include adequacy regulations, standard contractual clauses, or binding corporate rules.

## 11. DATA SECURITY

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction or damage. These include:

- Secure storage of paper records in locked cabinets with restricted access
- Password-protected and encrypted devices and systems; regular software updates
- Role-based access controls so staff only access data necessary for their role
- Secure disposal: shredding of paper records; certified secure deletion of electronic data
- Staff training on data protection, information security and incident reporting
- Regular review of security measures and incident response procedures
- Use of reputable, compliant suppliers for any digital platforms

We have procedures to detect, report and investigate personal data breaches. Notifiable breaches will be reported to the ICO within 72 hours where required, and affected individuals will be informed where there is a high risk to their rights and freedoms.

## 12. DATA RETENTION AND DISPOSAL

We retain personal data only for as long as necessary for the purposes for which it was collected, taking into account legal, regulatory, insurance and operational requirements. Our retention approach includes:

- **Children's core records and learning journals:** Generally retained until the child's 25th birthday or for 6 years after the child leaves the setting, whichever is longer. This supports continuity of care, transition to school, and potential future safeguarding enquiries.
- **Safeguarding and child protection records:** Retained in line with statutory guidance and local authority requirements, often until the child's 25th birthday or longer where necessary.
- **Staff records:** 6 years after employment ends for most records; longer where required for pensions, DBS update service, or legal claims.
- **Photographs and videos:** Retained as part of the child's educational record while consent remains valid or for the retention period above. Parents may request earlier deletion subject to overriding legal bases.
- **Funding and financial records:** 6 years plus current year (HMRC/audit requirements).

At the end of the retention period, data is securely destroyed or anonymised. A detailed retention schedule is available on request from the Data Protection Lead.

## 13. YOUR DATA PROTECTION RIGHTS

Under the UK GDPR (as amended by the DUAA), individuals have the following rights in relation to their personal data (exercisable by parents/guardians on behalf of children where appropriate):

- **Right to be informed:** We provide clear privacy information at the point of collection and through this policy.
- **Right of access (Subject Access Request):** You can request a copy of the personal data we hold about you/your child. We will respond within one month (extendable by up to two further months for complex

requests). The DUAA clarifies that we only need to carry out reasonable and proportionate searches. We may 'stop the clock' while we seek clarification or identity verification from you.

- **Right to rectification:** You can ask us to correct inaccurate or incomplete data.
- **Right to erasure ('right to be forgotten'):** You can request deletion of your data in certain circumstances, subject to legal retention obligations (especially safeguarding).
- **Right to restrict processing:** You can ask us to limit how we use your data in specific situations.
- **Right to data portability:** Where processing is based on consent or contract and carried out by automated means, you can request your data in a portable format.
- **Right to object:** You can object to processing based on legitimate interests or direct marketing (easy opt-out for marketing).
- **Rights related to automated decision-making:** You have safeguards against solely automated decisions with significant effects (we currently do not use such processing for significant decisions). The DUAA has made the framework more permissive but requires safeguards including human review options.

To exercise any of these rights, please contact us using the details above. We will not usually charge a fee unless the request is manifestly unfounded or excessive.

## 14. COMPLAINTS AND RAISING CONCERNS

If you have a concern about how we handle personal data, please contact our Data Protection Lead in the first instance. We are committed to resolving issues quickly and fairly.

In line with DUAA requirements, we facilitate the making of complaints. You can raise a concern by email, phone, or in person. We will acknowledge receipt promptly and aim to provide a full response without undue delay.

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO):

- Website: [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 15. AUTOMATED DECISION-MAKING AND PROFILING

We do not currently make solely automated decisions that have a legal or similarly significant effect on individuals. If we introduce any such processing in the future (for example, AI-assisted tools for assessment or admissions), we will comply with the DUAA-amended rules under Article 22 UK GDPR. This includes providing meaningful information about the logic involved, enabling individuals to make representations and challenge decisions, and ensuring human intervention is available on request.

## 16. COOKIES, WEBSITE AND ONLINE TECHNOLOGIES

Our website ([littlesticksforestschoo.co.uk](https://littlesticksforestschoo.co.uk)) may use cookies and similar technologies for essential functionality, performance/analytics, and (with consent where required) marketing. In line with the DUAA amendments to PECR, we may use certain low-risk storage and access technologies (e.g. strictly necessary or statistical cookies) without prior consent. We provide clear cookie information and an easy way to manage preferences.

Where we use digital tools for learning documentation or parent communication, we select providers that meet high UK data protection standards and configure them to protect children's privacy by default.

## 17. STAFF RESPONSIBILITIES, TRAINING AND ACCOUNTABILITY

All staff, volunteers and trainees are required to handle personal data in accordance with this policy and receive appropriate data protection training, including awareness of the DUAA changes, the importance of children's higher protections, and how data protection interacts with safeguarding. Training is refreshed regularly.

We maintain a Record of Processing Activities (ROPA) as required by Article 30 UK GDPR. We carry out Data Protection Impact Assessments (DPIAs) for any high-risk processing (e.g. new digital systems processing special

category data on a large scale).

## 18. POLICY REVIEW AND UPDATES

This policy will be reviewed at least annually, or sooner if there are significant changes to legislation (including further DUAA commencement regulations or ICO guidance), our processing activities, or operational needs. The next scheduled review is June 2027.

Any material changes will be communicated to parents/carers and staff as appropriate, and the updated policy will be made available on request and (when we have one) on our website.

---

### Policy Approval

This Data Protection Policy has been approved by the Proprietor / Management of Little Sticks Forest School and is effective from 30 June 2026.

**Signed:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_ **Role:** \_\_\_\_\_

*This policy demonstrates our commitment to protecting personal data in accordance with the Data (Use and Access) Act 2025 and the wider UK data protection framework. We welcome feedback and are happy to provide further information or clarification on request.*