



## Privacy Policy

**Last Updated:** 6th July 2026

At **Signing Stars**, we are committed to protecting and respecting your privacy, as well as the privacy of the children who attend our classes. This Privacy Policy explains how we collect, use, store, and protect your personal data, specifically in alignment with our strict safeguarding protocols.

### 1. Information We Collect

To provide our services and maintain a safe environment, we may collect and process the following categories of personal data:

- **Parent/Guardian Information:** Name, contact details (phone number, email address), and billing information.
- **Attendee (Child) Information:** Name, age/date of birth, and any relevant Special Educational Needs (SEN) or medical requirements to ensure safe and effective care.
- **Safeguarding & Incident Records:** In exceptional circumstances, we may record written concerns, disclosures, or logs of suspected abuse or neglect. This may include the child's actual words as mandated by our safeguarding procedures.

### 2. How We Use Your Information

We use your data strictly to operate **Signing Stars** effectively and safely. This includes:

- Managing class bookings, registrations, and communication.
- Ensuring children grow up and learn in circumstances consistent with safe and effective care.
- Fulfilling our legal and regulatory duties, including the Data Protection Act 2018, GDPR, *Working Together to Safeguard Children*, and the *Prevent Duty*.

### 3. Legal Basis for Processing

We process personal data under the following lawful bases:

- **Contractual Necessity:** To fulfil our service agreement with you (e.g., managing class attendance).
- **Legal Obligation:** To comply with statutory UK safeguarding laws.
- **Vital Interests:** To protect the critical welfare, health, or life of a child or individual in an emergency.



#### 4. Confidentiality, Sharing, and Disclosure

Information regarding our attendees is kept strictly confidential and is only shared on a strict "need to know" basis.

**Important Safeguarding Note:** The duty to protect a child overrides all other duties of confidentiality. If we have reasonable grounds to suspect child maltreatment, abuse, or neglect, we have a legal obligation to share relevant data with external authorities, such as **Kent County Council Social Care** or the police, without parental consent if it is deemed necessary to keep the child safe.

#### 5. Data Storage and Security

We take data security very seriously to prevent unauthorized access, disclosure, or loss:

- All general attendee records are stored securely.
- In accordance with our safeguarding policy, all safeguarding records and concerns are stored **securely and separate** from general attendee records.
- Access to sensitive safeguarding records is strictly restricted to our Designated Safeguarding Lead (DSL) and authorized personnel.

#### 6. Data Retention

We only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including any legal, accounting, or statutory safeguarding reporting requirements.

#### 7. Your Rights

Under the UK GDPR, you have the right to access, correct, or request the erasure of your personal data. However, please note that your right to data erasure may be overridden by our statutory obligations to retain safeguarding records to protect the welfare of children.

Additionally, **where you have previously provided your consent to us, you have the right to withdraw your consent** to the processing of your information at any time:

- **Marketing Communications:** You can withdraw your consent to our use of your marketing data at any time by using the "unsubscribe" link included in our email marketing communications.
- **Third-Party Class Providers:** If you have consented to receive marketing information from an independent Class Provider associated with us, please contact that Class Provider directly to withdraw your consent.

#### 8. Other Websites



Our website may contain links to other websites. **Signing Stars** is not responsible for the privacy policies or practices of any third party. We encourage you to read the privacy statements of each website you visit.

## 9. Updating this Policy

**Signing Stars** may update this Policy from time to time at our discretion, and to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, we shall post a new version of this Policy on our website. You should check this page occasionally to ensure you are familiar with any changes.

## 10. How to Make a Complaint

We take any complaints about our collection and use of personal data very seriously. If you believe that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by contacting our Designated Safeguarding Lead (DSL) using the details below.

Alternatively, you have the right to make a complaint at any time directly to the UK supervisory authority for data protection:

- **Information Commissioner's Office (ICO)**
- **Website:** <https://ico.org.uk>
- **Helpline:** 0303 123 1113

## 11. Key Contact Details

If you have any questions about this Privacy Policy, your data rights, or how to file a complaint, please contact our **Designated Safeguarding Lead (DSL)**:

- **Name:** Sian Halsall
- **Phone:** 07579102219