POLICY DOCUMENT

The Recharge Club™

Data Protection Policy and Privacy Notice

How Personal Information is Collected, Used and Protected by The Recharge Club™

Data Controller:	NutriDive Ltd, trading as The Recharge Club™
Company Number:	16659858
Registered Office Address:	39 Coltsfoot Drive, Chorley, PR6 0JP
Information Commissioner's Office Registration:	To be confirmed on completion of registration
Data Protection Lead:	Mrs Michaela Cmorej, Director
Deputy Data Protection Lead:	Mr Michal Cmorej, Deputy Director
Status:	Mandatory Policy and Public-Facing Privacy Notice
Date Adopted:	1st August 2026
Review Frequency:	Annually, and immediately following any data breach or change in data protection law
Next Review Due:	Twelve months from the date of adoption
Related Policy:	This document is read alongside the Child Protection and Safeguarding Policy

1. Policy Statement

The Recharge Club™ takes the privacy and security of personal information seriously, recognising that it holds sensitive information about children with special educational needs and disabilities, their families, and its staff. NutriDive Ltd, trading as The Recharge Club™, is the data controller for all personal information processed by the organisation.

This document is in two parts. Part A is the organisation's internal Data Protection Policy, setting out how personal information is governed, secured and retained. Part B is the Privacy Notice provided to families, explaining in plain terms what information is collected about them and their child, why, and what rights they have.

> ***NutriDive Ltd, trading as The Recharge Club™, is the data controller referenced throughout this document, including in all regulatory registrations such as those with the Information Commissioner's Office and the Office for Standards in Education, Children's Services and Skills.***

PART A: DATA PROTECTION POLICY

2. Purpose and Scope

This policy applies to all personal information processed by The Recharge Club™, including information about children and young people, their families, staff, bank workers, volunteers, and any other individual whose information the organisation holds. It applies to information held on paper, electronically, or in any other format.

3. Legal Framework

This policy has been written with regard to the following legislation and guidance:

- The United Kingdom General Data Protection Regulation
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations 2003, in respect of electronic marketing communications
- Working Together to Safeguard Children, insofar as it sets out principles for sharing information to protect a child's welfare
- Guidance issued by the Information Commissioner's Office, including its guidance on children and data protection

The Recharge Club™ is registered with the Information Commissioner's Office as a data controller, under NutriDive Ltd, trading as The Recharge Club™.

4. Data Protection Principles

The Recharge Club™ processes personal information in accordance with the following principles. Personal information is:

- Processed lawfully, fairly, and in a transparent manner
- Collected only for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for those purposes
- Accurate, and kept up to date where necessary
- Kept only for as long as is necessary for the purposes for which it is processed
- Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, loss, destruction or damage

5. Categories of Personal Information Processed

The Recharge Club™ processes the following categories of personal information:

- Identity and contact details for children, parents, carers and emergency contacts
- Special category data, including information about a child's special educational needs, disability, and health, recorded in Individual Support Plans, individual health care plans, and medication records
- Safeguarding records, including concerns, disclosures, and referrals

- Booking, attendance and payment information
- Photographs and video, where specific consent has been given
- Staff and bank staff recruitment, vetting, training and payroll information

6. Lawful Basis for Processing

Purpose	Lawful Basis
Providing day respite care to a booked child	Performance of a contract with the parent or carer
Recording special educational needs, disability and health information necessary to support a child safely	Explicit consent, and, in respect of vital interests, protecting the child's life or physical safety in an emergency
Safeguarding concerns, disclosures and referrals	Legal obligation and vital interests, rather than consent, given the paramount importance of child protection
Meeting regulatory, tax and food safety obligations	Legal obligation
Taking and using photographs for marketing or social media	Explicit, specific consent, which may be withdrawn at any time
Staff recruitment and vetting, including enhanced checks with the Disclosure and Barring Service	Legal obligation and legitimate interest in safe recruitment

7. Special Category Data

Information about a child's special educational needs, disability, and health is special category data under the United Kingdom General Data Protection Regulation, and is processed with particular care. Where this information is needed to keep a child safe in an emergency, it is processed on the basis of protecting the child's vital interests, rather than relying solely on consent, since consent could not be relied upon if withdrawn at a critical moment. Explicit consent is otherwise sought and recorded as part of the Individual Support Plan process.

8. Data Security

- Paper records containing personal or special category data are kept in locked storage, accessible only to those who need it
- Electronic records are stored using password-protected, encrypted systems, with access limited to staff who need it for their role
- Safeguarding records are held separately and are accessible only to the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead
- Personal devices belonging to staff are never used to store or transmit personal information about children or families
- Any third-party service used to store or process personal information, such as a booking or payroll system, is selected only where it provides appropriate contractual data protection guarantees

9. Data Sharing

The Recharge Club™ shares personal information only where necessary and lawful, including with a child's school, health professionals, the local authority, and, where appropriate, the Office for Standards in Education, Children's Services and Skills. Information is never sold, and is never shared with third parties for marketing purposes.

10. Retention of Information

Category of Information	Typical Retention Period
Safeguarding records	Until the child's twenty-fifth birthday, in line with statutory guidance, or longer where advised by the local authority
Individual Support Plans and individual health care plans	Duration of attendance, plus three years
General booking, attendance and payment records	Six years, in line with tax and accounting requirements
Photographs and video used for marketing	Until consent is withdrawn, or three years, whichever is sooner
Staff recruitment and vetting records	Six years after employment ends, or in line with safer recruitment guidance

11. Individual Rights

Any individual whose personal information The Recharge Club™ holds, or a parent or carer acting on behalf of a child, has the right to request access to that information, request that inaccurate information be corrected, request that information be deleted where it is no longer necessary, request that processing be restricted or object to it in certain circumstances, and request that information be provided in a portable format where relevant. Requests should be made in writing to the Director, and are responded to within one calendar month.

12. Data Breaches

Any suspected or actual data breach, such as the loss of a device, an email sent to the wrong recipient, or unauthorised access to records, is reported to the Director immediately. Every breach is recorded, regardless of severity. Where a breach is likely to result in a risk to the rights and freedoms of individuals, it is reported to the Information Commissioner's Office within seventy-two hours of the organisation becoming aware of it, and, where the risk is high, affected individuals are informed directly and without undue delay.

13. Roles and Responsibilities

Data Protection Lead	Mrs Michaela Cmorej, Director. Holds overall accountability for data protection compliance, responds to individual rights requests, and manages any data breach.
Deputy Data Protection Lead	Mr Michal Cmorej, Deputy Director. Deputises fully for the Data Protection Lead in their absence.
All Staff	Handle personal information only in line with this policy, report any suspected breach immediately, and complete data protection training as required.

14. Training

All staff and bank staff receive data protection training as part of their induction, covering the safe handling of personal and special category data, and how to recognise and report a data breach. This training is refreshed at least every two years.

PART B: PRIVACY NOTICE FOR FAMILIES

15. Who We Are

The Recharge Club™ is a trading name of NutriDive Ltd, a company registered in England and Wales, whose registered office is at 39 Coltsfoot Drive, Chorley, PR6 0JP. NutriDive Ltd is the data controller responsible for your, and your child's, personal information.

16. What Information We Collect

Before your child's first session, we ask for information including your child's name and date of birth, your contact details and those of anyone else authorised to bring or collect your child, emergency contact details, information about your child's special educational needs, disability, and health, including any medication, and details relevant to your child's Individual Support Plan. During your child's time with us, we also keep records of attendance, the sessions they attend, any incident or safeguarding concern, and, where you have given specific consent, photographs or video.

17. Why We Collect It, and Our Legal Basis

We collect this information so that we can provide safe, appropriate care tailored to your child's individual needs, keep your child safe, communicate with you, meet our legal and regulatory obligations, and, only where you have given specific consent, share photographs on our website or social media. The legal basis for each of these purposes is set out in Part A of this document, and we are happy to explain this in more detail on request.

18. Who We Share Information With

We share information only where necessary, and only with: your child's school or education setting, with your consent, where this supports their care; health and social care professionals involved in your child's care; the local authority, where relevant to funding or support arrangements; the Office for Standards in Education, Children's Services and Skills, as our regulator; and our insurers, in the event of a claim. We never sell your information, and we never share it with third parties for their own marketing purposes.

19. How Long We Keep Information

We keep information for as long as necessary for the purpose it was collected, as set out in the retention table in Part A of this document. Safeguarding records are kept for longer than other records, in line with statutory guidance, given their importance if a concern needs to be revisited in the future.

20. Your Rights

You have the right to ask us what information we hold about you or your child, to ask us to correct anything that is inaccurate, to ask us to delete information we no longer need, and to object to or restrict certain uses of your information. To exercise any of these rights, please contact the Director in writing. If you remain unhappy with our response, you have the right to complain to the Information Commissioner's Office.

21. Keeping Your Information Secure

We store paper records securely under lock and key, and electronic records on password-protected, encrypted systems. Access to your child's safeguarding records is limited to the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

22. Photographs and Social Media

We only take and use photographs or video of your child with your specific, written consent, which you may withdraw at any time. We never publish your child's full name alongside their photograph.

23. How to Raise a Concern

If you have any concern about how we handle your information, please contact the Director in the first instance. If you remain unhappy, you have the right to complain to the Information Commissioner's Office, whose contact details are available at ico.org.uk.

24. Changes to This Notice

We may update this notice from time to time, for example to reflect a change in the law or in how we operate. The current version is always available on request and is provided to every family before their child's first session.

This document has been approved by the Director of The Recharge Club™ and forms part of the organisation's statutory compliance framework.