

JUNIOR ADVENTURES GROUP UK

Confidentiality & Complaints Policy

September 2025

The JAG UK Safeguarding & Inclusion team would like to introduce you to S.A.F.E – S.A.F.E is the JAG UK safeguarding mascot he promotes JAG as clubs which provide. Look out for S.A.F.E in our clubs



Policy date:	September 2025
Policy author:	Mekila Kelly – Head of Safeguarding & Welfare
Version:	1
Agreed & Ratified by Board	September 2025
Date of next full review	September 2026

JAG Safeguarding & Inclusion Team - Key Contacts

	Name	Contact information
Head of Safeguarding & Welfare (Lead DSL)	Mekila Kelly	Safeguarding@junioradventuresgroup.co.uk
Lead Safeguarding & Inclusion Partner (Deputy DSL / SENDCO)	Vicky Sales	SENDSCO@junioradventuresgroup.co.uk
Safeguarding & Inclusion Partner (Deputy DSL / SENDCO)	Emma Harrison	SENDSCO@junioradventuresgroup.co.uk
Safeguarding Governor/Director	Craig Jones	Craig.jones@junioradventuresgroup.co.uk

Policy Contents

• DSL Team – Key Contacts	Page 1
• Policy Statement	Page 2
• GDPR	Page 3
• Confidentiality	Page 3
• Smart Devices	Page 8
• Internet & Social Media	Page 9
• Complaints Procedure	Page 10



Policy Statement

JAG recognises its duty of care and is committed to safeguarding from harm and promoting the wellbeing of all children attending our clubs. All JAG policies and ways of working are in place to keep our clubs, the children, our leaders and partners safe always.


All JAG leaders are required to adhere to all obligations and requirements as set out in, but not limited to Early Years Statutory Framework 2025, Keeping Children Safe in Education 2025, SEND Code of Conduct 2014, Health & Safety at Work Act 1974, Children's Act 1989. All JAG UK policies are underpinned by all current legislation and guidance.

JAG is committed to keeping information regarding all stakeholders and partners confidential and in line with GDPR regulations. It is the responsibility of JAG to ensure that all those accessing and using information whilst working for or using JAG services can do so safely and with confidence.

GDPR

UK General data Protection Regulations (GDPR) is for all those who have day-to-day responsibility for data protection and applies to JAG. GDPR is tailored by the Data Protection Act 2018.

JAG are 'controllers' of data as we determine the purposes and means of processing personal data. JAG does this by.

- 
- Deciding/needing to collect and process personal data
 - Decide what the purpose or outcome of the data processing is to be
 - Decide (governed by legislation) what personal data should be collected
 - Decide which individuals collect which personal data
 - Obtaining a commercial gain or benefit from the data processing
 - Processing personal data because of contact between JAG and the data subject (stakeholders and partners)
 - Making decisions about the individuals concerned as part of or because of the data processing
 - Exercising professional judgement in the processing of data
 - Having direct relationships with data subjects
 - Having complete autonomy as to how the data is processed

Personal data

Personal data is defined as information which relates to an identified or identifiable individual, this could be as simple as a name or number or could include other identifiable such as an IP address or a cookie identifier. It is any information which is being processed making it possible to directly identify an individual.

Information which has identifiers removed or replaced to pseudonymize the data is still personal data for the purposes of GDPR.

7 principles

JAG keeps the 7 principles of processing personal data at the heart of its operations and approach. These are.

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability



Data lawful basis

JAG has a valid lawful basis to process personal data. At least one of the following articles applies when JAG processes personal data.

- CONSENT – the data subject has given clear consent for JAG to process their personal data for a specific purpose
- CONTRACT – the processing is necessary for a contract JAG have with the individual

- LEGAL OBLIGATIONS – the processing is necessary for JAG to comply with the law
- PUBLIC TASK – the processing is necessary for JAG to perform tasks in the public interest of for official functions of which there is a clear basis in law
- LEGITIMATE INTERESTS – the processing is necessary for JAG legitimate interests or the legitimate interests of a third party

JAG continually reviews the purposes of our processing activities and selects the most appropriate lawful basis for each activity.

JAG's processing is necessary for its relevant purposes, and we are satisfied that there is no other reasonable and less intrusive way to achieve these purposes.

JAG processes criminal offence data where a condition for processing this data has been identified.




Data subject rights

All data subjects (individuals) for whom JAG processes personal data have the following rights.

- THE RIGHT TO BE INFORMED about the collection and use of their personal data
- THE RIGHT TO ACCESS and receive a copy of personal data and other supplementary information
- THE RIGHT TO RECTIFICATION whereby individuals have a right to have inaccurate personal data rectified or completed if it is incomplete
- THE RIGHT TO ERASURE is also known as the right to be forgotten whereby the individuals have the right to have their personal data erased
- THE RIGHT TO RESTRICT PROCESSING applied in certain circumstances
- THE RIGHT TO DATA PORTABILITY allows individuals to obtain and reuse their personal data for their own purposes across different services
- THE RIGHT TO OBJECT to the processing of their personal data in certain circumstances

Data security

JAG processes all personal data securely by taking appropriate technical and organizational measures which are.

- Undertaking analysis of the risks presented by our processing and using this to assess the appropriate level of security we need to have in place
 - Having additional policies and procedures in place and ensure that controls are in place to enforce them
 - Assessing what we need to do by considering the security outcomes we want to achieve
 - Having basic technical controls in place
 - Using encryption and/or pseudonymization where it is appropriate to do so
 - Understanding the requirements of confidentiality, integrity and availability of the personal data we process
 - Ensuring we can restore access to personal data in the event of an incident with a backup process
 - Conducting regular testing and reviews of our measures to ensure they remain effective and act on the results of these where they highlight areas for improvement
 - Adhering to ICO (Information Commissioners Office) approved code of conduct
- 

ICO Registration

JAG is registered with the ICO, and our registration reference is: **ZB521868** – expiring **7th March 2026**

Types of information collected by JAG UK

Data stored on	Information stored
Parents/Guardians	Name, relationship with child, address, contact details, bank details
Children	Name, address, date of birth, medical information, special needs requirements & any other relevant information
Employees	Name, address, contact details, bank details, NI number, qualifications, DBS & Safeguarding checks
Other	Accident/incident forms, Safeguarding referral forms that may contain personal information (as above)

How information is stored & protected by JAG UK

Storage Type	Examples of storage	How protected
Paper	Medical Forms, HCP's and ANPs	Kept in locked storage in settings and on applicable systems
Devices	Any child/information/booking information and JAG UK forms. All email correspondence. Accident & incident reports	Password protected or on a secure server
Bookings database	Please see above child/parent section for information we maintain	All information on secure server via password protected log on details

Length of time stored by JAG UK

Information to be stored	Retention timeframe
Children's records including registers, medication records	For a reasonable period (after next Ofsted inspection) as stated in the EYFS Welfare requirements (a minimum of 6 months)
Accident/Incident reports	Retained until the child reaches the age of 21
Child protection records	Retained until the child reaches the age of 24
Records of any reportable death, injury, disease or dangerous occurrence	Retained for 3 years after the record was made
Colleague personnel files and training records	Retained for 6 years after employment ceases
Finance records	Retained for 6 years
Complaints log	For a reasonable period (after next Ofsted inspection) minimum 2 years

Disposal of data

Hard copies of documents are destroyed in the following ways.

- Shredded in club on site
- Placed in confidential waste unit in the JAG support office

Electronic records will be deleted from all devices or an automated forget me function used on the relevant systems. Disposable of electronic records will render them non-recoverable.

Data sharing with outside agencies

JAG will only share information with outside agencies on a need-to-know basis and with the consent of the data subject or their next of kin, except in cases relating to safeguarding or criminal activity.

JAG will only share information which is accurate and up to date.

JAG's primary commitment is to the safety and wellbeing of all stakeholders and data subjects.

Confidentiality

All JAG leaders will respect confidentiality in the following ways.

- No information will be shared regarding children or JAG colleagues with anyone other than parent/guardians or next of kin
- Parents/guardians only have access to information about their own children and no other stakeholders
- JAG leaders will only discuss individual children for the purposes of planning and club management
- JAG leaders are made aware of the importance of confidentiality during their induction
- Information provided by data subjects to JAG will not be passed on to third parties without permission unless there is a safeguarding concern
- Concerns or evidence relating to a child's safety will be kept confidential and not shared amongst JAG leaders except where required with JAG lead DSL's
- Issues relating to the employment of JAG colleagues will remain confidential to those making personnel decisions
- Any conversations of a difficult or sensitive nature will be held in private safe spaces

Smart devices

It is the intention of JAG to provide an environment in which children, parents/guardians and leaders are safe from images being recorded and inappropriately used, in turn eliminating the following concerns.


- Leaders being distracted from the roles and responsibilities
- Inappropriate use of smart devices and cameras in the presence of and around children
- Children's use of technology

It is the responsibility of all JAG leaders to be vigilant and report any concerns on use of smart devices to safeguarding@junioradventuresgroup.co.uk. All concerns will be taken seriously and fully investigated – this could lead to dismissal of JAG leader and involvement of external professionals including LADO and police.

Personal devices

It is the responsibility of all JAG leaders to ensure their personal devices are kept securely during their time in club and for the most senior leader in the club to ensure this is happening and that no personal devices are accessed during club times.

It is for the most senior JAG leader of a club to risk assess the most appropriate and secure place for personal devices to be stored. Noting all JAG clubs are provided with a lockable box for this purpose. Personal devices must only be accessed and used on breaks and in a different space away from the children. If a leader needs to receive a call due to an emergency within club times they are required to provide the JAG club phone number and inform the most senior leader in the club at the time.



Any JAG leader found to be accessing and or using any personal device during club time will be investigated and disciplinary procedures followed. If a JAG leader is thought to have used a personal device to take images, videos etc. or in any other way involving the children this must be reported immediately to safeguarding@junioradventuresgroup.co.uk and safeguarding reporting procedures will be followed.

JAG devices


JAG provides clubs and individuals based on role and responsibility devices which are needed to enable them to carry out their responsibilities effectively. Some of the tasks requiring this use may be but are not limited to scanning documents, contacting stakeholders, taking photos of activities with prior permissions, and completing documentations.

JAG leaders within specific roles and with these responsibilities may need to be contactable whilst in a club by other clubs or JAG leaders. Should a call need to be taken or made on a JAG device the call handler (JAG leader) must do so outside of the play space where the children are. JAG leaders who have been provided JAG devices are not permitted to use personal devices and must adhere to personal devices procedures as outlined above.

It is the responsibility of the individual or most senior club leader to ensure all provided JAG devices are always maintained and kept safe. Any devices deemed to be lost or stolen must be reported to the direct line manager immediately.

JAG devices and use of camera

Photos/videos taken for the purpose of recording a child or group of children participating in activities and experiences or celebrating their achievements is an effective way of recording development and progression. These can be shared with individual children's parents/guardians and for training purposes with prior consent.



Only JAG provided devices can be used to take photos and videos of the children in the club and only where prior consent is in place. Images taken must be for a purpose and deemed suitable without putting any child in compromising positions that could cause embarrassment or distress and must not be for any form of personal gratification of the JAG leader taking these. Images of children must not be shared from JAG devices to any personal or individual devices. All images must be transferred from JAG devices onto SharePoint weekly and deleted from said devices.

Devices of parents & visitors

Parents and visitors are not permitted to use their devices in the club or vicinity of the children. Visitors must sign in to the club as per the visitors' procedures with personal devices being stored securely as per personal devices procedures outlined above.

JAG leaders are within their right and expected to challenge any person in the club or vicinity of the children who has a device in hand or use, explaining the reasons why this is not permitted.

Marketing

On occasions and with prearrangements the JAG marketing team may visit a club to take promotional images using JAG provided devices. All procedures as per JAG devices noted will be always adhered to.

Children's use

Children are not permitted to use personal devices within JAG clubs. Any child who has a device will be asked to keep this securely stored during their time in club. JAG leaders will offer to store these in the club lock box for the duration of time the child is in club returning this to them when they are collected.

If a child refuses to leave their devices during their time in club the JAG leads have the right to remove these from the child's possession and return them to the child's parent/guardian on collection.

Children's screen time

JAG does not give children access to screens during their time in club. Our standing is 'no screen time'. This includes but is not limited to.

- Phones
- Tablets/iPad
- Films
- TV

JAG may use screen to support group physical activities only i.e. just dance but for no other reason.

Emails

Online contact made as part of professional duties should only be carried out using JAG provided devices.

Emails must only be sent using JAG email addresses, no information must be shared via personal email addresses.

Internet/Online

No JAG leader or anyone representing JAG should enter online contact with children (regardless of age) they work with and therefore have a professional relationship with. Any friend requests from children under the age of 18 years should be politely declined by explaining that this engagement is against JAG policy, which is designed and in place to protect the children and JAG leaders from

misunderstandings and vulnerabilities. It is then advisable for the JAG leader to report this request and decline to their direct line manager and to inform the child's parent/guardian.

There must be no, without exception, private contact between JAG leaders and any children with whom they have JAG related relationships. This includes private messaging and storing of images of children on either JAG or personal devices.


No JAG leader should create web pages, groups or contact lists concerning professional activities carried out on behalf of JAG. Any activities of this nature must be done in consultation with the JAG marketing team.



Social media

JAG UK wants you to be proud to work for us and we understand that you may want to include a high-level reference on social media sites about your employment and will hopefully have positive messages to share about the overall experience of being a JAG UK colleague. Providing information about your job or work history is entirely optional on most social media websites and is not essential when making social media connections with colleagues you know personally. The best way to avoid the risks highlighted is to avoid making any references to JAG, your job or the work undertaken by you or your colleagues on social media sites.

If you do wish to link yourself to JAG UK, make only the basic references so as not to reveal details of the work that you do. 'Liking', 'following' or becoming a fan of an official JAG UK social media page, feed or service is acceptable and welcomed. Avoid detailed reference to JAG UK, your job or work undertaken by you or your colleagues on social media sites. Such information could be used to compromise the company's security checks or encourage others to make inappropriate contact with you or other employees.



Complaints Procedure

JAG believes that children and parents are entitled to expect a high-quality service which is what JAG also expects. If, however, JAG does not meet these expectations we value the opportunity to review and amend our practices, addressing any concerns aiming to bring these to a satisfactory conclusion for all parties.

The purpose of this procedure is to outline the preferred routes any complainant should take to have their concerns dealt with promptly and appropriately.

All complaints will be triaged and dealt with by an appointed suitable JAG leader.

Complaints can be raised initially with the most senior JAG leader in the club at the time or by emailing hello@junioradventuresgroup.co.uk

On receipt of any complaint JAG uses a RAG rating system to categorise based on severity and complaint context.

G – Green – low level complaint (operational club level)

A – Amber – a medium level of complaint (accidents, operational concerns)

R – Red – high level of complaint (safeguarding, compliance, risk, major accident)

All complaints will be acknowledged on receipt within 24 working hours; this will then be sent to the JAG leader appointed to manage the case. JAG aims to initially address all complaints within 72 working hours of receipt.

Red-rated complaints will be immediately escalated to a General Manager/ Head of Education and Wellbeing and/or JAG lead DSL as an internal investigation may be required. In this instance the investigation will be conducted with the aim of resolving with an agreeable outcome within 14 working days.

JAG has a three-stage complaints schedule; JAG envisages that all complaints will be resolved informally at stage one. All complaints are logged and records kept for three years.

Child Protection

1. If child protection issues are raised, the JAG lead DSLs will seek advice from the Local Authority's Safeguarding Partnership team and follow the procedures of the **Safeguarding & Children's Welfare**.
2. If a criminal act may have been committed, JAG lead DSLs will contact the Police.

Stage 1 – Club Manager or General Manager to be involved

Complaint about the setting:

- The Club Manager will discuss the matter informally with the parents/guardians concerned and aim to reach a satisfactory resolution.
- If parents/guardians make the complaint regarding the Club Manager this will be passed to the General Manager to investigate and to respond

Complaints about an individual JAG employee:

- If appropriate, the parent/guardian will be encouraged to discuss the matter with the employee concerned
- If the parent/guardian feels that this is not appropriate the matter will be discussed with the Club Manager who will then discuss the complaint with the employee and try to reach a satisfactory resolution.

Stage 2 – General Manager and Head of Education and Wellbeing & HR to be involved

If it is impossible to reach a satisfactory resolution to the complaint through informal discussion, the parent/guardian should put their complaint in writing to the Support Office. Support Office will:

- Acknowledge receipt of the communication within 24 working hours
- Contact the complainant within 5 working days
- Resolve the complaint within 14 working days
- Where applicable JAG UK will send a full response in writing to all relevant parties including the outcome and the changes made in response to the complaint
- It may be suitable to meet relevant parties to discuss JAG UK response to the complaint either together or on an individual basis

Stage 3 – Head of Education and Wellbeing and Safeguarding Team to be involved

If the parent/guardian is not happy with the resolution, then at stage 3 the complaint is to be referred to the HEW to evaluate the action taken and determine if the complaint has been handled satisfactorily.

This re-evaluation of the complaint is aimed to be resolved within 14 days from referral.

Making a complaint to Ofsted

Any parent/guardian can submit a complaint to Ofsted about JAG at any time. Ofsted will consider and investigate all complaints.

Ofsted's address is - Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

Telephone: 0300 123 1231 (general enquiries) 0300 123 4666 (complaints)

On receipt of a complaint Ofsted will investigate accordingly, either through a telephone conference with the named persons or in the event of receipt of a major complaint they could carry out an unannounced inspection to the club.

All complaints are logged and discussed with Ofsted at the next inspection.

