

Inverbrothock Out of School Care Club

Charity Number: SC030097

[Confidentiality policy](#)

At Inverbrothock Out of School Care Club, we respect the privacy of the children and their families attending the club. Our aim is to ensure that all those using and working at Inverbrothock Out of School Care Club can do so with the confidence that their personal data is being kept securely and confidentially.

The General Data Protection Regulation and Data Protection Act 2018 replaced the Data Protection Act 1998. The Regulation and Act regulate the way we handle and process personal data that we hold and the main provisions of this apply from 25th May 2018.

Our Data Controller is Diane Rennie. Diane Rennie can be contacted at:

Name: Inverbrothock Out of School Club

Address: East Kirkton Road, Arbroath DD11 4GR

E-mail: inverbrothock@aoosc.com

The Data Controller ensures that the Club meets the requirements of the General Data Protection Regulations (GDPR), liaise with statutory bodies when necessary, and respond to any subject access requests.

Confidentiality

Within the club we respect confidentiality in the following ways:

- We only ever share information with a parent/carer about their own child.
- Information given by parents to Club staff about their child will not be passed on to third parties without permission unless there is a child protection concern (as covered in our child protection policy).
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process, this is also updated yearly.
- All personal data is stored in a securely lockable file or on a password protected computer or passcode locked phone.

Billing system

We currently collect and process the following information:

- Parents' names, address, contact telephone numbers and email address.
- Your child/ren's first name
- Your reference number you supply in payments.
- Your payments due, paid, date paid and method of payment.

We do not directly store your bank account details and any account information used for Direct Debits is stored by your direct input into Go Cardless.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To process payments for our service
- To maintain records of payments and financial account information according to the law.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Your bank showing the narrative sent with your payment.

We use the information that you have given us in order to process payments for the service.

We may share this information with Quickfile and GoCardless, our Direct Debit service and any regulatory bodies we may have to do so by law.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- **You can remove your consent at any time. You can do this by contacting the address at the beginning of this document.**
- **We have a legal obligation [for fraud protection].**

Consent is granted by your registration to use the service.

How we store your personal information

Your information is securely stored.

We keep payment details and personal details for seven years in the Quickfile system, Personal details will be stored for seven years from the last payment. We will then dispose of your information by removing it from Quickfile.

The data will be stored according to Quickfile Privacy policy

<https://support.quickfile.co.uk/t/privacy-policy/18934#:~:text=We%20collect%20anonymised%20data%20about,size%20and%20average%20viewing%20times.>

And if you choose to use Direct Debit, from GoCardless Privacy Policy

<https://gocardless.com/privacy/details/#:~:text=You%20may%20have%20rights%20under%20privacy%20and%20data,may%20have%20the%20right%20to%20Object%20to%20processing.>

Information that we hold

We hold only the information necessary to provide a childcare service for each child. This includes child registration information, parent/carer contact information, attendance records, incident and accident records, any medical information, and any other relevant information.

Once the child leaves our care, we retain only the data required by statutory legislation, for the prescribed or recommended periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely and responsibly.

We do not store any information that is not needed in guidance with the GDPR guidelines.

Staff information

We keep information about employees to meet HMRC requirements, and to comply with all other areas of employment for the recommended period, then it is deleted or destroyed, as necessary.

Sharing information

We will only share information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to Child Protection, criminal activity, or if required to by legally authorised bodies (e.g. Police, HRMC, Care Inspectorate etc).

Subject Access Request

Parents and carers can ask to see the information and records relating to their child, and/or any information that we hold about themselves.

Staff and volunteers can ask to see information that we keep about them.

If any information that we hold is found to be incorrect or out of date, we will update it promptly.

If an individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the above address.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

The records that we hold within the club are:

- Registration form detailing names, addresses, and contact details of the children and their parents/carers for emergency purposes.
- Any medication consent and administering details.
- Any accidents and incidents that occur within the club.
- Personal portfolio details for every child that is registered with the club.
- Any details of allergies and any care plans.

We only keep records for as long as we need them and do not hold onto records if they are no longer used. We only hold information necessary to provide a childcare service for each child. Once a child leaves our care, we retain only the data required by statutory legislation and industry best practice, for the prescribed or recommended periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

This is how long we keep records for:

- Registration forms - We only keep these records for as long as the child is registered with us. When the child leaves the setting, we responsibly dispose of these records.
- Any medication consent forms and administering records will be kept for 3 years.
- Any accidents and incidents involving children will be kept for 3 years.
- Any accidents involving adults who visit the setting will be kept for 3 years.

- Personal portfolios will be given out to the parent or carer on the last day they attend the club, if this is not taken, they will be responsibly disposed of immediately.
- Any allergy advice and care plans will be given back to their parents on the child's last day or responsibly disposed of.
- We will keep any documentation of any accidents or incidents involving children or adults that have involved medical attention for 6 years.
- All insurance documents must be kept for up to 40 years.
- Any complaints made to the club will be kept for 3 years.

We do not store any information that is not needed in guidance with the GDPR guidelines.

We will ensure that:

- Records will be confidential and kept in secure storage.
- Parents/carers will have ready access to any written information regarding their child.
- Information given by parents/carers to the manager or other staff members will only be shared with adults that need to know or can access the information.
- Parents/carers will have access to their own child's file from the manager only.
- Undertaking not to disclose confidential information unless required to do so in matters of child protection and in life-or-death situation.
- Adhering to all relevant legislation such as the Data Protection Act 2018.
- Data will be kept as accurate and up to date as possible. To comply with this Inverbrothock Out of School Care Club will not store information longer than necessary for the purpose registered, in accordance with the data protection guidelines.

Request for information what we do next.

If a request for information is made, we will seek to reply as soon as possible to this request. Some requests will be able to be handled by the manager of the club. Other complex requests will require the management committee to deal with this request. This will take longer as our parent committee is made up of parents who volunteer their time to the running of the club. If a request is going to take longer, then we will write to you to tell you why we cannot provide

the information straight away and a timescale of how long, we expect to take to provide this information to you.

- If a request is made to the club and the manager can deal with this the information will be given straight away. A record of the request will be kept and the outcome of this request.
- If a request is made to the club but cannot be dealt with by the manager, this will be passed onto the management committee for the safe handling of the information.
- If the management committee are dealing with an information request, then they will write immediately to the parent to inform them that they have received the request. In this letter it will also detail a timeline of when the information will be available.
- If the request involves third party information or will identify staff or other service users, then the information will not be given.
- When the information is a staff account this information will be unavailable as we need to protect staff identity.
- We will not keep data that is no longer needed, we may anonymise information for keeping. This will depend on the data, and we may safely dispose of information when it no longer becomes purposeful to keep it.

Authorised disclosure of information

The Out of School Club will, in general, only disclose data about individuals with their consent. However, there are circumstances under which the Out of School Club needs to disclose data without consent for that occasion.

These circumstances are limited to:

- Child data disclosed to authorised recipients related to education and administration necessary for the Out of School Club to perform its statutory duties and obligations.
- Children's data disclosed to authorised parties in relation to their child's health, safety, and welfare.
- Children's data disclosed to parents in relation to their child's progress, achievements, or general behaviour within and in the vicinity of the Out of School Club environment.
- Staff data disclosed to relevant authorities - i.e., for payroll and administrative duties.

Data can be requested to be viewed by governing bodies such as the care inspectorate for inspection purposes.

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding, obtaining, storing, and using personal data.

The above policy is approved and hereby adopted by the IOOSCC Committee

Updated July 2025.