

## Inverbrothock Out of School Care Club

Charity Number: SC030097

### Confidentiality and Data Protection Policy

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

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 25<sup>th</sup> May 2018.

Our Data Controller is Diane Rennie. The Data Controller ensures that the Club meets the requirements of the General Data Protection Regulation (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:

- a. We only ever share information with a parent about their own child.
- b. 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).
- c. Staff only discuss individual children for purposes of planning and group management.
- d. Staff are made aware of the importance of confidentiality during their induction process, this is also updated yearly.
- e. Staff take part in Data Protection training yearly.
- f. All personal data is stored in a securely lockable file or on a password protected computer or passcode locked phone

#### Information that we hold

We hold only the information necessary to provide a childcare service for each child. This includes child registration information, parent 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 legislation. We retain the information after a member of staff has left our 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 by legally authorised bodies (e.g., Police, HMRC, 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).

### Subject Access Request, what we do next:

We will make the request information available as soon as practicable and will respond to the request within one month at the latest. 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.

- a. 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.
- b. 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.
- c. 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.
- d. If the request involves third party information or will identify staff or other service users, then the information will not be given.
- e. When the information is a staff account this information will be unavailable as we need to protect staff identity.
- f. 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.

## GDPR

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 January 2021.