



# Meltham School's Out

## Data Protection Policy

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Approved by:	Meltham School's Out Committee		
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### 1.0 Aims

The aim of this policy is to ensure that all those using and working at Meltham School's Out can do so with confidence that their personal data is being kept secure.

### 2.0 Roles and Responsibilities

- The lead person for data protection is the club manager. The lead person ensures that the club meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.
- All staff and volunteers are responsible for ensuring that information is kept secure and is not shared unnecessarily with any third parties, unless a safeguarding concern requires it.

### 3.0 Policy

At Meltham School's Out we respect the privacy of the children attending the club and the privacy of their parents/carers, as well as the privacy of our staff.

#### 3.1 Confidentiality

Meltham School's Out respects confidentiality in the following ways:

- Staff only ever share information with a parent 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 safeguarding issue (as covered in our Safeguarding Policy)
- Concerns or evidence relating to a child's safety will be kept in a confidential file and will

not be shared within the club, except with the Designated Safeguarding Lead and the manager.

- 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.
- Staff, students on work placement and volunteers must read the Staff Privacy Notice and sign a declaration to state that they agree with it and abide by it.
- Issues relating to the employment of staff - whether paid or voluntary - will remain confidential to those making personnel decisions.
- All personal data is stored securely in a lockable filing cabinet/on a password protected computer/passcode-locked phone.

### **3.2 Information that we Keep**

The items of personal data that we keep about individuals that use the service are securely stored on our personal data matrix. The personal data matrix is reviewed regularly to ensure that only up-to-date and relevant data is kept.

#### **3.2.1 Children and Parents**

We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent/carer contact information, attendance records, incident and accident records, etc. Once a child leaves the club, we retain only the data required by statutory legislation and industry best practice for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely or returned to parents/carers. This information is communicated to parents/carers via the Privacy Notice (Appendix 1) included in the Application Pack, which they must read and sign.

#### **3.2.2 Staff**

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. It is deleted or destroyed as necessary.

### **3.3 Sharing Information with Third Parties**

The club only shares child/ren's information with outside agencies on a need-to-know basis and with consent from parents/carers, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (EG Police, HMRC, etc). If information is shared without parental consent, this is recorded in the child's file; clearly stating the reasons for doing so. The club only shares relevant information that is accurate and up-to-date. Our primary commitment is to the safety and well-being of the children. Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, (EG to provide monthly invoices, statements and to manage our payroll and accounts). Any such third parties comply with the strict data protection regulations of the GDPR.

### **3.4 Social Media**

We only post photographs of children onto our social media platform(s) in accordance with the 'Photograph and Communication Consent Form' that parents/carers complete and sign as part

of the Application Pack when their child/ren first join the club. Any photographs posted onto social media do not include names of children or any other personal information.

### **3.5 Subject Access Requests**

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.
- Staff and volunteers can ask to see any information that we keep about them.
- The requested information is made available as soon as practicable, and management respond to the request within one month at the latest.
- If information is found to be incorrect or out-of-date, it is promptly updated.
- If an individual 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).

### **3.6 GDPR**

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

## 4.0 Appendices

### 4.1 Meltham School's Out Parent/Carer Privacy Notice

At Meltham School's Out we respect the privacy of the children attending the club and the privacy of their parents/carers. The personal information that we collect about you and your child is used only to provide appropriate care for them, maintain our service to you, and communicate with you effectively. Our legal basis for processing the personal information relating to you and your child is so that we can fulfil our contract with you.

Any information that you provide is kept secure. Data that is no longer required is erased after your child has ceased attending our club.

We will use the contact details you give us to contact you via phone and/or email, so that we can send you information about your child, our club and other relevant news, and so that we can communicate with you regarding payment of fees.

Children's first names *and* surnames will be displayed on the signing in and out registers. Parent/carers can request for surnames to be removed.

We will only share personal information about you or your child with another organisation if we:

- have a safeguarding concern about your child
- are required to by government bodies or law enforcement agencies
- engage a supplier to process data on our behalf (EG to issue monthly invoices using the Kashflow system from Stead Robinson Accountants)
- have obtained your prior permission.

You have the right to ask to see the data that we have about yourself or your child, and to ask for any errors to be corrected. We will respond to all such requests within one month. You can also ask for the data to be deleted, but note that:

- we will not be able to continue to care for your child if we do not have sufficient information about them
- even after your child has left our care, we have a statutory duty to retain some types of data for specific periods of time\* so can't delete everything immediately.

If you have a complaint about how we have kept your information secure, or how we have responded to a request to access, update or erase your data, you can refer us to the Information Commissioner's Office (ICO).

**Please sign and date below to confirm that you have read this Privacy Notice and that you give your permission for us to contact you regarding relevant matters.**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_

*\* We do need to retain certain types of data (such as records of complaints, accidents, and attendance) for set periods of time after your child ceases to be in our care, but we delete as much personal data as we can as soon as possible.*