



The Cabin Crew Out of School Club Confidentiality/Data Protection Policy

At The Cabin Crew Out of School Club it is our intention to respect the privacy of the children and of their parents or carers, whilst ensuring they access high quality care. Our aim is to ensure that all parents, carers, and those working at the Club, can share their information in the confidence that their personal data is being kept secure and will only be used to enhance the welfare of the children.

Our lead person for data protection is **Heather Osborn**. 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.

We will respect confidentiality in the following ways:

- Parents can ask to see the records relating to their child, but will not have access to information about any other children.
- 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.
- Information given by parents to Club staff 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.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- Confidential records are stored securely in a lockable filing cabinet.
- Students on work placements and volunteers are informed of our confidentiality policy and are required to respect it.

Information that we keep

The items of personal data that we keep about individuals are documented on our personal data matrix. This is reviewed annually to ensure that any new data types are included.

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 contact information, attendance records, incident and accident records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parents. Our legal condition for processing any health-related information about a child, is so that we can provide appropriate care to the child. Once a child leaves our care, we retain only the data required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

Staff: We keep information about employees in order to meet HMRC requirements, and to comply with all other areas of employment legislation. Our lawful basis for processing this data is to meet our legal obligations of employment law. We retain the data after a member of staff has left our employment for the periods required by statutory legislation and industry best practice, then it is deleted or destroyed as necessary.

Sharing information with outside agencies

We will only share information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children or criminal activity, or if required by legally authorised bodies (e.g. Police, HMRC etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Subject access requests

- Parents / carers can ask to see the information and records relating to their child or themselves.
- Staff and volunteers can ask to see any information that we keep about them.
- We will make the requested information available as soon as practicable and will respond to the request within one month at the latest.
- If our information is found to be incorrect or out of date, we will update it promptly.
- Parents / carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care we have to keep some data for specific periods so won't be able to delete all data immediately.
- Staff and volunteers can ask us to delete their data, but this may mean that we can no longer employ them as we have a legal obligation to keep certain data. In addition, even after a staff member has left our employment, we must keep some data for specific periods so won't be able to delete all data immediately.
- If any 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 Commissioners Office (ICO).

GDPR

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

This policy was adopted by The Cabin Crew Out of School Club.	Date: 12 November 2016
To be reviewed: December 2017	Signed: <i>Heather Osborn</i>
Name of signatory: Heather Osborn	Role of signatory: Manager

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017)*:
Safeguarding and Welfare Requirements: Information and records [3.68 -3.70].