



Mangotsfield Out of School Club Privacy and Data Protection Policy

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Privacy and Data Protection Policy - MOOSC16.03

Purpose

MOOSC respects the privacy of the children attending the Club as well as the privacy of their parents/ carers in addition to that of our staff and volunteers. The primary commitment of the Club is to the safety and well-being of the children in our care.

The Club aims to make sure that all those using its services and working within it can do so with the confidence that their personal data is kept securely, in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017 and updated 2022): Safeguarding and Welfare Requirements: Information and records [3.68 -3.71]*.

General Data Protection Regulation (GDPR)

The Club makes sure to comply with the requirements of the GDPR (May 2018) regarding the obtaining, storing and using of personal data.

The Lead Person for Data Protection at the Club is the Play Manager. The Lead Person will ensure that the Club meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

Confidentiality

The Club respects confidentiality by:

- Only ever sharing information with a parent/ carer about their own child(ren);
- Keeping information given by parents/ carers to Club about their child(ren) private and secure;
- Not passing information onto third parties without express permission of the parent/ carer unless there is a safeguarding issue in accordance with our Safeguarding Policy;
- Safely storing any concerns or evidence relating to a child's safety, which is not available to, or shared with, any staff with the exception of the Designated Child Protection Officer and the Play Manager;
- Only discussing individual children with relevant staff for purposes of planning activities and group management;
- Making staff aware of the importance of confidentiality during their induction process; and
- Securely storing all personal data in a lockable cupboard, on a password protected computer and/ or passcode-locked phone.

What Information The Club Holds

The Club only holds information necessary to provide a childcare service for each child.

This includes a child's registration information, medical information, Educational Health Care Plan (EHP) and Child Protection Registration, parent/ carer contact information, attendance records, incident and accident records and email records. Our lawful basis for processing this data is the fulfilment of our contract with a child's parents/ carers.

The Club's legal condition for processing any health-related information about a child is so that it can provide appropriate care to the child.

Once a child leaves the care of the Club, only the data required by statutory legislation and industry best practice is kept, and only 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.

The Club carries out an annual review of its records.



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Third Parties

The Club only shares child information with outside agencies on a need-to-know basis and with express consent from parents/ carers. The exception to this statement is only in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g. Police, HMRC).

Should the Club decide to share information without parental consent, it will be recorded in the child's file with clear reasoning.

The Club will only share relevant information that is accurate and up to date.

Some limited personal information is disclosed to authorised third parties that the Club has engaged with in order to meet the operational needs of the business (for example online bookings). Any such third parties comply with the strict data protection regulations of the GDPR and the Club ensures to have clear Service Level Agreements in place.

Subject Access Requests

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

The Club will endeavour to provide the requested information available as soon as possible (where appropriate), and will respond to the request within one calendar month.

If the information held by the Club is found to be incorrect or out of date, it will be updated promptly.

Parents /carers can ask for data to be deleted but this may mean that we can no longer provide childcare to the child as the Club has a legal obligation to keep certain data. In addition, even after a child has left the Club, data must be kept for a specific amount of time.

If any parent/ carer has a complaint about how the Club has kept information secure or the Club's response to a subject access request, complaints must be made in the first instance to the Committee or to the Information Commissioner's Office (ICO).

Related Policies

1. Complaints
2. Mobile Phone
3. Safeguarding