



Data Protection Policy and Procedure

Adopted on: 24/05/2018

Review date: 24/05/2019

The staff at Coral Cove Out of School Club intend to comply fully with the requirements and principles of the Data Protection Act 1984, the Data Protection Act 1988 and the General Data Protection Regulations.

Enquiries

General information about the Data Protection Act can be obtained from the Information Commissioners Office (ICO), website: <https://ico.org.uk>

Fair Obtaining and Processing

The setting undertakes to obtain and process data fairly and lawfully by informing all data subjects of the reasons for data collection, the purposes for which the data are held, the likely recipients of the data and the data subjects' right of access.

Reasons for Data Collection

When registering your child to attend our facilities, you are providing yours and your child's data to ensure we are able to care for them in the best possible way. It is an Ofsted requirement that we seek certain details from yourselves including relevant permissions to ensure we are able to operate safely. Without this data we would be unable to allow your child to use our facilities.

Why we hold your data

We hold your data to ensure we can contact you effectively in an emergency, provide you with invoices for your child's care and meet your child's needs correctly.

Any data recipients?

We do not share your data with any third party unless there is a legal reason to do so.

Right of Access to your Data

You can request access to the data we hold about yourself / your child. You must make this request in writing and the company has 30 days to respond to your request. If your request is refused we must tell you why we are refusing your request. We will only charge for requests that are excessive or unfounded.

Term	Definition
“processing”	obtaining, recording or holding the information or data or carrying out any set of operations on the information or data.
“data subject”.	an individual who is the subject of personal data or the person to whom the information relates
“personal data”	data, which relates to a living individual who can be identified. Addresses and telephone numbers are particularly vulnerable to abuse, but so can names and photographs be, if published in the press, Internet or media
“parent”	has the meaning given in the Education act 1996, and includes any person having parental responsibility or care of a child.

Data Integrity

Coral Cove Out of School Club undertakes to ensure data integrity by the following methods:-

Data Accuracy	Data held will be as accurate and up to date as is reasonably possible.
Data Adequacy and Relevance	Data held about people will be adequate, relevant and not excessive in relation to the purpose for which the data is being held. In order to ensure compliance with this principle, the Club will check records regularly for missing, irrelevant or seemingly excessive information and may contact data subjects to verify certain items of data.
Length of Time	Data held about individuals will not be kept for longer than necessary for the purposes registered, in accordance with Data Protection guidelines.

Authorised Disclosures

The setting will, in general, only disclose data about individuals with their consent. However there are circumstances under which the Club may need to disclose data without explicit consent for that occasion. These circumstances are strictly limited to:

- Pupil data disclosed to authorised recipients related to education and administration necessary for the Club to perform its statutory duties and obligations.
- Pupil data disclosed to authorised recipients in respect of a child’s health, safety and welfare.
- Pupil data disclosed to parents in respect of their child’s progress, achievements, attendance, attitude or general demeanour within or in the vicinity of the Club.
- Staff data disclosed to relevant authorities e.g. in respect of payroll and administrative matters.
- Personal data. Only authorised staff are allowed to make external disclosures of personal data. Data used within the setting by the staff will only be made available where the person requesting the information is a professional legitimately working with the setting, who needs to know the information in order to do their work. Should a safeguarding concern/issue arise, both pupil and personal data will be shared as detailed in the Safeguarding Children Policy and Procedures. The setting will not disclose anything on pupils’ records which would be likely to cause serious harm to their physical or mental health.

“legal disclosure”	the release of personal information to someone who requires the information to do his or her job within or for the setting.
“illegal disclosure”	the release of information to someone who does not need it, or has no right to it, or one which falls outside Club’s registered purposes

Data Security

Coral Cove Out of School Club undertakes to ensure the security of personal data with regard to all measures mentioned in this Policy. Any queries or concerns about security of data in the setting should in the first instance be referred to the Manager.

Physical Security

Appropriate building security measures are in place, such as locks on the filing cabinets. Only authorised persons are allowed into the cabinets. Disks, memory sticks and printouts are locked away securely when not in use. Visitors to the setting are required to sign in and out and are, where appropriate, to be accompanied at all times.

Individual members of staff can be personally liable in law under the terms of the Data Protection Acts. They may also be subject to claims for damages from persons who believe that they have been harmed as a result of inaccuracy, unauthorised use or disclosure of their data. A deliberate breach of this Data Protection Policy will be treated as disciplinary matter, and serious breaches could lead to dismissal.

Permissions

When you signed your child up with us, you provided details of the permissions you were willing to give. These permissions still stand unless you notify us otherwise in writing that you wish these permissions to be changed.

Photographs

Photos fall under data protection laws. Our Out of School Club activities are sometimes photographed, for use in the building, on our website, in advertising material, social media or in the press. We asked permission to include your child when he/she joined the Out of School Club, and what you said then still applies. If you want to change your mind at any time that's okay but *you must inform us in writing*.

Contact information

For many children, emergency contact information includes details of grandparents, other family members, friends or trusted neighbours. The person or people you've listed ought to know that we retain their information for the time your child attends with us, therefore we are asking you to ensure they are aware that we hold their details. We think holding these details *is* in the public interest so we're not asking for permission to do so.

Disposal of Information Kept

All personal details, when no longer required, will be disposed of sensibly by use of a shredder.

As your registration fee with us provides you with access to our child care facilities until your child begins secondary school, we will retain and store your records as follows;

- When your child leaves to attend secondary school - your registration details will be securely shredded.
- When your child leaves due to family circumstance - we will retain your registration details on file in case you wish your child to return to our care, when your child reaches secondary school age your registration details will then be shredded. We will also shred your registration details on your request or if you have not used our services for at least 2 years, however if you later wish your child to attend with us again then you will need to re-register with us.
- Invoices - we must retain copies of all invoices we send for 6 years, therefore your address details will remain on these. They are stored in accordance with the Data Protection Regulations.
- Accident / Incident Forms - we are required to retain these for 10 years, in more serious cases we are required to retain these details until your child's 25th Birthday. These are also stored in accordance with Data Protection Regulations.

Policy dated: ____/____/____

Signed for and on behalf of the Setting: _____

Print: _____