



Privacy and confidentiality policy and procedure:

Bryn Coch Club's work with children and families involves being aware of, recording and keeping sensitive and confidential information. This policy applies to all staff, volunteers, students and (management/committee members).

It is the policy of Bryn Coch Club to ensure that all who use and work in the provision can do so with confidence.

We respect the need for confidentiality by:

- Designating (registered person/responsible individual/committee officer/person in charge/communications officer) as the lead person for information/communications sharing.
- Ensuring that parents have access to any files and records about their own children but do not have access to information about any other children.
- Arranging to share information with parents who request it, in private.
- Ensuring that issues to do with the employment of staff, volunteers and students, whether paid or unpaid, remain confidential to the people directly involved with making personnel decisions.
- Enabling staff, volunteers and students to have access to their own files and records, but not to information about any other member of staff, volunteer or student.
- Ensuring that staff, volunteers and students do not discuss concerns about individual staff members with anyone other than their delegated manager (or that person's delegated manager)
- Ensuring that staff, volunteers and students sign that they have read, accept and implement this privacy and confidentiality policy at their induction.
- Keeping all documents/forms and electronic data containing personal information securely in line with the Data Protection Act 1998 which covers GDPR (General Data Protection Regulation) this also applies to transporting personal information from place to place. (The policy folder is retained in a locked cupboard in the office along with all other confidential information and staff files)
- Registering with the Information Commissioner's Office regarding the information held on children in our care on any electronic device (computer, mobile phone, USB flash drive/memory stick, digital camera, memory card, and so on) OR being aware of the Information Commissioner's Office regarding the information held on children in our care and ensuring we do not need to register.
- Ensuring that confidential information is shared with other agencies only by the Bryn Coch Club's delegated person who has the authority to do so. In these circumstances the parents' consent is obtained (except in cases where this may place a child at risk)
- Making available personal data to CIW as required by day care regulations.
- Keeping records of concerns/information relating to children's safeguarding confidential and in line with Bryn Coch Club's child protection policy and the *Wales Safeguarding Procedures* <https://safeguarding.wales/>
- Taking seriously any breach of confidentiality at Bryn Coch Club. This is considered as gross misconduct that can lead to disciplinary action and dismissal.
- Following statutory regulations regarding the period of storing information (for example: company law, insurance company, CIW, Data Protection Act 1998, GDPR, charity law and local authority). We keep personal information for at least three years after the last date on which the child attended and accident records for at least 21 years. (Adapt as needed – check with your insurers)
- Disposing of any information (that can be disposed of) responsibly, by shredding or burning.

- Ensuring any computer or electronic device holding personal data is wiped before it is passed onto a third party.
- Ensuring that any computer or electronic device that has shared use (for example in a committee member's family) has a system of password protection (as a minimum) for any stored personal information.
- Obtaining parents' consents before using cameras, or video recording equipment with their children.

This Privacy and Confidentiality policy and procedure was passed for use in Bryn Coch Club (CIO #1196346)	
On: _____	
By: _____	Position: _____
Date of planned review: _____	

Additional guidance:

Look at NMS 6 outcome: parents are kept fully involved in and informed about their child's activities, achievements and progress

Look at:

- NMS 5.5 - says records about individual children must be retained for a period of at least three years after the last date on which the children attended. The requirements of a registered person's insurance may require records to be retained for longer; usually accident records must be kept for 21 years – it is your responsibility to check with your own insurers.
- NMS 5.6 - says that records about individual children are kept secure and confidential and are always available for inspection by CIW at their request.
- NMS 6.6 which requires a confidentiality policy. It is also required in an application for registration with CIW.
- The Information Commissioner's Office for guidance about the Data Protection Act 1998 and check if the way you keep information about children requires you to register:
<https://ico.org.uk/for-organisations/guide-to-data-protection/>

Reg 30 (1) (a); (b); (c)

People who use your service (parents and employees) have a right to know **what information** you keep about them; **why** you keep it; **where** you keep it; **how long** you keep it and **how** you destroy it when it is no longer needed.