

Trinity After School Care

Privacy Policy

WHAT IS GDPR?

Data regulations have changed and we will always respect how you want us to use your details.

GDPR (General Data Protection Regulation) is Europe wide legislation which came into effect from the 25th May 2018 and it is concerned with how personal data is stored, handled, shared and destroyed - it recognises an individual's rights to privacy, including that of children.

When your child starts attending our Service, we have a responsibility to ask for you to provide the information required to provide the service. This will include details below.

It is a legal obligation by the Care Inspectorate that we as an organisation hold personal data on children, and we require personal data on children to ensure the children's wellbeing and safety within our care.

We are responsible for storing all the data you provide in a secure manner.

PERSONAL DATA INFORMATION THAT WE HOLD FOR CHILDREN AND THEIR FAMILIES

As an organisation we obtain the following personal data from our parents and children, through registration forms and additional information forms. For our staff, by holding their recruitment interview details, their PVG/SSSC and training records and their personal next of kin information

For children, this can include:

- Children's name, age, home address, date of birth and days attending the club
- Parents name, home address, email address, contact details both work and home,
- Emergency contact home address and contact details
- Allergies, medical issues, support needs or additional needs that your child may have
- Any medication that your child may take
- Your child's GP contact details
- Your child's likes and dislikes
- Your child's first language
- Any parental concerns for your child

WHO WE CAN POTENTIALLY SHARE PERSONAL DATA WITH

We may share personal data with other organisations such as:

- Care Inspectorate – a scrutiny body that supports improvement and helps make sure our quality of care is of a high standard. Their vision is that everyone experiences safe, high quality care that meets their needs, rights and choices. They have access to our children's registration records, to ensure we have the correct data required and that we follow the legislation of GIRFEC (Getting It Right For Every Child). *"GIRFEC is the national approach in Scotland to improving outcomes and supporting the wellbeing of our children and young people by offering the right help at the right time from the right people. It supports them and their parent(s) to work in partnership with the services that can help them."*

Care Inspectorate also ensure that staffing levels are correct, and that we as staff follow the guidelines to ensure we have the correct skills to care for our children, the correct training in place to comply with quality care and correct and updated checks through SSSC (Scottish Social Services Council) and PVG (Protection of Vulnerable Groups). This is a legal requirement.

- Social Work Department/Police – sharing information if children are at risk, *“If there is reasonable concern that a child may be at risk of harm this will always override a professional or agency requirement to keep information confidential. All professionals and service providers have a responsibility to act to make sure that a child whose safety or welfare may be at risk is protected from harm. They should always tell parents this.”* <http://www.gov.scot/Publications/2004/04/18512/28931>
- Doctors or Hospital – this would be done ONLY if there was a medical emergency requiring immediate care for your child
- HMRC – they may get in touch with a parent or the organisation, looking for evidence that a child has or did attend any of our services, there is a legal obligation to share your personal data when required.
- Learning Journals – to enable us to follow the GIRFEC framework we store data on Learning Journals such as name, date of birth, support needs (if any), name of parent (carer), email address and photographs of the child.
- School Head Teacher – As part of our duty of care and good practice
- With other agencies involved in the prevention, detection, investigation or prosecution of crime or other unlawful activities, including Police Scotland. Other agencies which have a role in the protection of vulnerable people, including local authorities and other regulatory bodies.

Please read the following statements and how we comply with GDPR.

1. The legal basis: to gather personal data in accordance with the GDPR legal obligation and this is in compliance with Care Inspectorate registration.
2. The information provided will be stored securely.
3. The following people from Trinity & Victoria After School Clubs will have access to the full personal data:
 - a) All After School Club staff, to execute provision of day to day services and running of the club
 - b) Chair of After School Club, limited to execution of Committee duties with valid justification to view/use personal data
4. Should any suspected data breaches occur, Trinity After School Club will investigate and report these data breaches, including notifying parents/carers and relevant authorities, for example, the Information Commissioners Office.
5. Any personal data will only be shared with other agencies on a parent/child consent basis unless it is a child protection issue which relates to a parent/carers, where child protection procedures come into effect.
6. Parents and children are able to request to see the personal data which is held by contacting Trinity After School Club.
7. This information will be reviewed every six months to ensure our records are accurate.
8. Personal data will be securely destroyed within 3 months of lapse of annual registration, or receipt of a written request to terminate services provided by Trinity After School Club, subject to full and final settlement of any outstanding fees.
9. All personal data in paper format will be shredded and all electronic data will be deleted with no back ups held. You have the right to request Trinity After School Club to return paper records to you rather than destroying them.
10. Right to be forgotten – at your request we will delete your personal information from our records where we don't have an overriding legitimate reason for holding on to it (e.g to comply with a legal obligation).
11. Right of access – you can write to us to ask for confirmation of what information (and other related information). Provided we are satisfied that you are entitled to see the information requested and we have confirmed your identity, we will provide you with your personal information subject to any exceptions that apply.

Our Data Protection Officer (DPO) is currently: Moira MacDonald, Manager. She is tasked with monitoring compliance with the GDPR and other data protection laws, our data protection policies, awareness – raising, training and audits.

Telephone: 07973548816

Email: info@trinityafterschoolclub.org.uk

Consent

Trinity After School Club (incorporating Victoria After School Club) require Parent / Carer consent to hold and process their data required for the provision of childcare services. As outlined above, the Club will only request and hold data deemed necessary and relevant to provision on services provided. Personally, identifiable data includes information which, on its own or in conjunction with other items of data, enables identification of individuals. This includes, but is not limited to, names, addresses, email addresses, invoices, care plans and photographs.

You can access Learning Journals privacy policy at: <https://www.learningjournals.co.uk/data-protection-policy/>

Data will not be provided to other third parties, including social media portals, unless explicit consent has been provided or the Club are legally required to do so, for example, in relation to Child Protection matters.

For further information or advice please contact:

The Information Commissioner's Office – Scotland

45 Melville Street

Edinburgh

EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk