



# Play in Ltd

## Data Protection & Privacy Policy

### Data Protection Policy

At Play in Ltd we respect the privacy of the children attending the Club and the privacy of their parents or carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at Play in Ltd can do so with confidence that their personal data is being kept secure.

Our lead person for data protection is Niala Haq. 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. Play in Ltd is committed to keeping all our customers (parents, carers, children and any other individual or company we may hold personal data on) personal data protected in accordance with The GDPR and Data Protection Act.

### GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data. For the full GDPR (General Data Protection Regulation) document, please refer to: <https://gdpr-info.eu>

### Data Protection Act

We comply with the requirements of the Data Protection Act 2018, regarding obtaining, storing and using personal data. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

### What data we store:

Every Parent/Carer who has booked their child into either our After School Club or any one of our Holiday Clubs will have the following data stored:

- Your/Partner's personal & contact details
- Child's personal & contact details
- Child's school
- Child's Doctors contact details & medical information (including allergies, medication, medical problems, dietary requirements)
- External agencies working with your child
- Information necessary for Safeguarding purposes, including your personal health habits, concerns for your child and others living at your address
- Consent forms for photography permission, medical treatment & Calpol, suncream application, short walks, school collection (walking bus) etc
- Information on your child's interests, likes & dislikes
- Signed Parental Contract with club
- (Profiles for children with SEN)

\*There may be other pieces of data which we have stored for example, independent walking bus permission slips or accident/incident records, however these will always be seen and signed by you and stored alongside all the above data.

### Why we store this data:

When a child is booked into a Play in Ltd After School or Holiday Club, the parent/carer is entering into a contract for us to be responsible for their child in their absence. In order to look after their child to the highest level of care, we need to have access to all the above data in

case we need to refer to it to ensure their welfare and safety. For example we may need to ring the parent or an emergency contact if a child is feeling ill, or we may need to check their medical records to see if they are allergic to anything.

On occasion, we will need to send our customers newsletters, important documents or reminders for upcoming holiday and after school clubs. Storing the above data (in particular, e-mail addresses) allows us to contact customers for these reasons.

### **How we store this data:**

- In paper form in a secure, locked safe place. This is only accessible by Play in Ltd Management and Senior staff.
- In digital form on our private database. This is only accessible by Play in Ltd Management and is password protected.

### **Confidentiality**

Within the Club we respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to Club staff about their child 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 and will not be shared within the Club, except with the designated Child Protection Officer and the manager.
- 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.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.

### **Information that we keep & for how long**

The items of personal data that we keep about individuals are documented above.

**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. Play in Ltd holds data as long as the business is required to do so. Electronic data that is no longer required is deleted and paper records are disposed of securely or returned to parents if requested.

**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. Our legal condition for processing data relating to an employee's health is to meet the 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.

### **Information that we share**

We will never sell or share your information with any other companies or third parties. We would only share personal data if required to do so by law.

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if

required by legally authorised bodies (eg 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.

Some limited personal information is disclosed to authorised third parties which we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR.

All sensitive information sent via email to you is password protected to ensure only the intended recipient can access the information.

Customers may e-mail us stating which data they would like us to remove and we will respond to confirm this has been done.

### **Subject access requests**

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about 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 have to 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 Commissioner's Office (ICO).

This policy was adopted by: Play in Ltd	Date: Jan 2020
To be reviewed: Jan 2021	Signed:

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017): Before/ after school care and holiday provision [3.40]* and *Safeguarding and Welfare Requirements: Information and records [3.68 -3.71]*. *The Data Protection Act 2018. The GDPR. Working Together to Safeguard Children 2018.*