

Data Processing Policy – POL007

This aim of this policy is to minimize the risk of inappropriate use and distribution of personal data relating to those that use Action for Children Children and Family Services, including those that use Happy Bananas Holiday Club. This specifically relates to “personal data” as identified by the Data Protection Act 1998 (hereinafter referred to as “The Act”) and, under the provisions of The Act, means

“...data which relate to a living individual who can be identified-

- (a) from those data, or (b) from those data and information which is in the possession of, or is likely to come into possession of, the data controller,...”. Happy Bananas staff are aware of obligations with regard to the processing of information under The Act and are committed to complying with its regulations and guidance. Happy Bananas staff are aware of the implications of The Act in so far as it affects *their roles* and responsibilities within the centre and the wider community.

All staff are familiarized with the provisions contained within this policy as part of their induction and are expected to act in accordance with them at all times. They have all signed to say they have seen these policy documents and know where to find them as part of their contract documentation.

Personal data is any data which relates to living individuals and by which that individual can be identified. For the purposes of this policy, 'personal data' also refers to: □ employment status □ appropriate records of children's progress and achievements. □ any other information relating to the child, deemed by staff, parents or carers, to be relevant and significant.

Sensitive Personal data:

Some of the information initially collected may include sensitive personal data as defined by The Act. Information that is collected and used by children's centres, that falls into this category includes:

- racial or ethnic origin
- physical or mental health or condition
- parents serving a prison sentence or known to be engaging in criminal activity
- completed Accident and Incident forms
- evaluation and other support process paperwork

Staff and Children and Family Services Information

Details relating to both our young people and employees will be kept in folders. In term time, these will be stored in room 34 (Teacher's PPA room). This is a secure room, in which only staff at The Edith Borthwick School or agreed parties, such as Action for Children staff are allowed. If managers need the folders, they can remove them, keeping them on their persons at all times, before returning to Room 34 upon completion of task.

During the running time of Happy Bananas Holiday Club, the folders will be stored in The School Office. This is a locked room, in which only Managers are allowed.

During Happy Bananas Holiday Club, Information packs will also be given to Instructors, regarding the staff and young people in their group. This contains personal data. The information will be kept in the locked zip locked in a secure location in their classroom. This place will be agreed my management on the first morning on Happy Bananas. All staff have signed contracts to agree to keep personal data secure, this forms part of our staff contract.

Data Processing

Action for Children is committed to a policy of openness with parents and carers in respect to this policy and its provisions, and to the information that the organization holds regarding them and their child(ren).

In the spirit of the Information Commissioner's Office's principle of 'Fair Processing' and under Schedule 2 of The Act, Children and Family Services only collect personal information that has a legitimate purpose and does not use the information in any way that has unjustifiable adverse effects upon the individuals concerned or use the data in any way that is unlawful under The Act. All of our staff are expected to be open and honest about the intended use of the information collected and handle this in a way that ensures its integrity under The Act.

All Children and Family Services have an accessible Fair Processing Notice available to all parents and carers and takes the form of a statement issued to parents as a part of the process for collecting information, particularly, but not exclusively, when completing a Action for Children Registration forms.

All Happy Bananas management have signed this paperwork to agree to this and Happy Bananas staff have signed to say they are aware of this policy as part of their contract.

Record Keeping and Data Security

Information collected and recorded on a child and parent or carer will include:

- full birth name (along with any other name the child is known by)
- date of birth
- gender
- ethnic origin
- languages spoken
- home address and telephone number(s)
- parents and carers names and addresses
- Medical records and information
- Behaviour plans and other school information (if needed)

- family doctor's name, address and telephone number
- health visitor's name, address and telephone number
- details of any special health issues (including a special educational needs or physical disability statement)
- appropriate records of children's progress and achievements
- attendance and outcomes of any Children and Family Service
- any other information relating to the child deemed by staff or parents or carers to be relevant and significant

All information collected will be stored in folders, in a secure location. (Described above)

Data Cleansing

All records will be updated each year. All previous records will be shredded following schools procedures.

Data Security

Only managers will have access to school records or student files on the school data base. This should not be necessary, as all information should be gathered before Happy Bananas holiday club starts each year.

Retention period

All records will be updated each year.

All previous records will be shredded following schools procedures.