



## SAND Out of School Club Privacy Notice for Parents and Carers

The purpose of this Privacy Notice is to tell you about what information SAND Out of School Club collects about you and your child, how that information is used and with whom we may share that information. Every parent or carer will receive a copy of this Privacy Notice when they register their child with us.

Name and contact details of the Data Controller: Sarah Grimwood 07766629330

### 1. What information we collect about you and your child?

| <b>For you (and for a second parent/carers if you provide these details):</b>   | <b>For your child/ren:</b>  |
|---|---|
| <ul style="list-style-type: none"> <li>• Name</li> <li>• Relationship to child</li> <li>• Who has parental responsibility</li> <li>• Each parent’s address and contact details including email and phone numbers</li> <li>• Contact details at work</li> <li>• The contact details of someone you trust whom we would contact, if for some reason you were not contactable</li> </ul> | <ul style="list-style-type: none"> <li>• Full legal surname (derived from family, clan or marital association) of the child*</li> <li>• Full given first name of the child*</li> <li>• Name child is generally known by</li> <li>• Date of birth *</li> <li>• Gender *</li> <li>• Your child’s current address and postal code*</li> <li>• With whom the child lives</li> <li>• The child’s siblings and significant people in your child’s life</li> <li>• The name of your child’s GP surgery</li> <li>• Allergies</li> <li>• Medical needs</li> <li>• Whether registered with a dentist and up to date with vaccinations</li> <li>• Ethnicity *</li> <li>• Religion</li> <li>• Language/s spoken at home.</li> <li>• Whether your child has any Special Educational Needs or Disability and if so, details.*</li> <li>• Whether social care are involved with your family and if so, whether your child is subject to a child protection plan, in care or a child in need and the name of our social worker</li> </ul> |



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### **2. What is our lawful basis for processing your child's data and for what purpose?**

Registered childcare providers have a statutory requirement to hold certain basic information about any child attending the setting and the name, address and contact details of every parent (Safeguarding and Welfare Requirements, EYFS 2017, 3.72 and Childcare Register CR8). The Safeguarding and Welfare Requirement to hold certain data is given force by an order made under section 39(1)(a) of the Childcare Act 2006, therefore the lawful basis for processing information is 'legal obligation' GDPR 6(1)(c) and for special categories of data (such as medical information, special needs and safeguarding) under GDPR 9(2) (a)(b).

We also hold information on the basis of 'legitimate interest' GDPR 6(1)(f) in order to ensure your child's safety and well-being and to provide a good quality service based on your child's individual needs.

Photographs are an effective way to illustrate and augment learning. Photographs will be taken with your consent GDPR 6(1)(9a) and for the purpose of informing you of your child's progress in learning

### **3. For how long will I hold your information: retention periods?**

The EYFS (3.71) says that as a provider we should determine ourselves how long to retain records relating to individual children.

- When your child moves on from our setting we will delete all photos and, in accordance with the advice of the Information Commissioner's Office
- For the purposes of insurance claims we will retain; the Accident and Incident Log, the Medication Administration Records, the Attendance Register, signed Consent Forms, the Complaints Log and any record of allegations, until your child has reached 21 years and 3 months.
- Any record of safeguarding concerns will be forwarded to the next setting/school in line with 'Keeping Children Safe in Education'. If a safeguarding referral to First Response has led or is likely to lead to criminal prosecution, requiring our records as evidence, we would take advice on retaining the record or retaining a copy of the record for our safeguarding concerns (see Goddard Inquiry).
- Any learning records and photographs of a 'looked after' child will be passed on to the child's Social Worker, who usually holds parental responsibility, for retention.
- Where we have shared your data with other Bristol City Council services, for example with regard to the Free Early Education Entitlement or Enhanced Provision Scheme, the general Bristol City Council retention schedule will apply and is available on the Bristol City Council website.
- HMRC financial records will be retained for six years.



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### **4. How does SAND Out of School Club use/process information about your child, including photographs?**

The information you have provided will be stored in paper form in a locked filing cabinet within the setting. Any electronically stored data is accessed via the setting's iPad which has security code access. Each manager has a laptop which is only accessed by them. The systems are password protected. No paper copies of email addresses or phone numbers are taken out of the setting. Kidsclubhq is our electronic booking and information system. As a data controller SAND has a responsibility to those whose information is stored and accessed via Kidsclubhq. It is our responsibility to ensure that Kidsclubhq is compatible with our GDPR obligations and is fit for purpose. You can view Kidsclubhq privacy policy via their website.

We liaise with you by email/text/using physical communication record. SAND has a designated email address and a designated work phone which is not used for any other purpose than contacting parents/carers regarding issues arising at the setting.

We take photographs using the setting's designated iPad. This is protected by a code and is not used by anyone other than Sarah Grimwood. Once photographs have been shared via social media (with parent/carer permission) or given to parents they are deleted from the device.

Our website collects anonymous information relating to user activity. We do not process or use this information.

We may ask for your written consent to keep some photographs for use in our own work, such as to evidence our own professional development or to promote our business.

### **5. Who we may disclose your child's information to and why: the recipients of the personal data.**

We will only share the information which you have provided about your child and the child's learning progress with you, the parent/carer, and with Ofsted, on the request of an Ofsted inspector, as the regulator and inspector of registered childcare settings.

In exceptional circumstances we may be required to disclose information in relation to safeguarding with the Local Authority Designated Officer, Children's Social Services/First Response, the police or legal services.

Information about your child's progress will only be shared with another professional such as a Health Visitor, SENCO, Speech and Language Therapist, Inclusion Specialist, Family Support or Early Help support worker after discussion with you and with your explicit, written consent. Liaison with another professional would be to support your child's learning and development and well-being.

### **6. The right to withdraw consent at any time, where relevant:**

You have the right to withdraw your consent where the information we hold is based on your consent, such as in the use of photographs. As we are legally required to hold some



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essential information on a child in order for them to attend the setting, if you withdrew consent to us holding all information about your child, they would no longer be able to attend.

### **7. Your rights as the data subject:**

You have the right to request access to your data and where data is found to be inaccurate, to have that data corrected. In certain circumstances you have the right to have the data held about you or your child erased, have the use of it restricted, object to processing, or have your data transferred to another data controller.

If you change any contact details, such as your mobile phone or your work phone number, please let us know. Likewise, please inform us if an emergency contact should change their contact details.

### **8. Access to your information:**

We will keep you updated and informed of your child's progress and share observation and assessments with you in keeping with the expectation of parent partnership which is described in the EYFS. You can ask to see what information we hold about you and have access to it. There are specific exemptions under which personal information may be withheld, for example if disclosure could cause harm to a child or another individual. You can make a 'subject access request' by contacting us in writing.

### **9. The right to lodge a complaint with a supervisory authority:**

You have the right to object to the processing of your information and to have any inaccurate information corrected. You also have a right of complaint to the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk) if you think we have dealt with your information in an inappropriate manner.

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Please sign and return this acknowledgement slip:

I confirm I have received a copy of SAND Out of School Club's Privacy Notice

\_\_\_\_\_  
Name of Child/ren

\_\_\_\_\_  
Parents/Carers signatures

\_\_\_\_\_  
Date