

033 Data retention, storage and disposal procedure

Policy statement

Grindleford and Eyam Playgroup (GEP) keeps records and documentation for the purpose of providing child care, meeting contractual obligations, meeting statutory requirements and maintaining our charity.

These include:

- Child registration forms
- Funding paperwork
- Staff records
- Records pertaining to our registration
- Financial records

A complete list of our documentation can be found in Appendices 1-3.

We consider our records as confidential based on the sensitivity of information. These records are maintained with regard to the General Data Protection Regulations 2018 (GDPR) and the Human Rights Act 1998.

Personal and special category data will only be collected if deemed necessary by GEP for the purpose of providing child care, meeting contractual obligations, meeting statutory requirements and maintaining our charity.

GDPR sets out the legal basis for processing personal data. We collect and use child information under GDPR Article 6, 1b, 1c and 1f, as well as Article 9, 2a and 2c.

This policy and procedure should be read alongside our Privacy Notice(s), Confidentiality and Client Access to Records Policy and Information Sharing Policy.

Procedures

All records are the responsibility of our management team who ensure they are kept securely.

All our records are kept in an orderly way in files and filing is kept up-to-date.

Our financial records are kept up-to-date for audit purposes.

We maintain health and safety records; these include risk assessments, details of checks or inspections and guidance etc.

Our Ofsted registration certificate is displayed.

Our Public Liability insurance certificate is displayed.

All our employment and staff records are kept securely and confidentially.

We operate a "clear desk" policy; this ensures all confidential/sensitive materials are locked away when the group leaves the setting.

We notify Ofsted of any:

- change in the address of our premises;
- change to our premises which may affect the space available to us or the quality of childcare we provide;

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- change to the name and address of our registered provider, or the provider's contact information;
- change to the person managing our provision;
- significant event which is likely to affect our suitability to look after children; or
- other event as detailed in the *Statutory Framework for the Early Years Foundation Stage 2017*

Data held by us

Child data

We keep two kinds of records on children attending our setting:

Developmental records

These include observations of children in the setting, photographs and samples of their work and summary developmental reports.

These are usually kept in a locked cupboard in setting and can be accessed, and contributed to, by our staff, the child and the child's parents.

Personal records

These may include the following (as applicable):

Personal details – including the child's registration form and any consent forms.

Contractual matters – including a copy of the signed parent contract (FE1 form), the child's days and times of attendance, a record of the child's fees, any fee reminders or records of disputes about fees.

Child's development, health and well-being – including a summary only of the child's EYFS profile report, a record of discussions about every day matters about the child's development health and well-being with the parent.

Early Support – including any additional focussed intervention provided by our setting (e.g. support for behaviour, language or development that needs an SEN action plan) and records of any meetings held.

Welfare and child protection concerns – including records of all welfare and protection concerns, and our resulting action, meetings and telephone conversations about the child, an Education, Health and Care Plan and any information regarding a Looked After Child.

Correspondence and Reports – including a copy of the child's 2 Year Old Progress Check (as applicable), all letters and emails to and from other agencies and any confidential reports from other agencies.

These confidential records are stored in a lockable file or cabinet, which is always locked when not in use and which our Supervisor keeps secure.

We read any correspondence in relation to a child, note any actions and file it immediately.

We ensure that access to children's files is restricted to those authorised to see them and make entries in them, this being our Supervisor, deputy or designated person for child protection, the child's key person, or other staff as authorised by our Supervisor.

We may be required to hand children's personal files to Ofsted as part of an inspection or investigation process; or to local authority staff conducting an audit, as long as authorisation is seen.

We ensure that children's personal files are not handed over to anyone else to look at.

Parents have access, in accordance with our Privacy Notice and Confidentiality and Client Access to Records Policy, to the files and records of their own children, but do not have access to information about any other child.

Staff, volunteer and management team data

We keep detailed records of our staff, volunteers and committee members (who make up our registered person) on site in a locked cupboard.

These include:

Staff/volunteer profile including contact details, qualifications and emergency contact information

Staff/volunteer induction training checklist

Staff training profile and copies of certificates

Name and contact information of current committee members plus copies of Ofsted suitability letters

Details of disclosure information – certificate number, date of issue and if registered with the update service. Further information on the handling of disclosure information can be found in Annex A.

Additionally, the Charity trustee nominated by the management committee retains copy of the following employment records:

Recruitment records – application form, interview notes, staff appraisals, PAYE paperwork, absence records including sickness.

Financial data

The financial management of the group is the responsibility of the committee. The Chair and the treasurer maintain our accounts, cash flow and invoicing system; both have access to our bank statements.

Legal requirements and compliance data

Copies of data relating to our legal requirements and compliance are kept by the Charity trustee nominated by the management committee. These include our provider agreement, constitution and insurance paperwork.

Data storage

We have record keeping systems in place that meet legal requirements; the means we use to store and share that information takes place within the framework of the GDPR and the Human Rights Act 1998.

Data may be held in manual and electronic format and must be kept accurate.

All paper-based documentation is kept in a locked cupboard within the setting. Archived documents are stored in a locked filing cabinet within the setting store room.

Documents kept off-site by the management committee are securely stored to prevent unauthorised access.

Electronic documents are stored on the pre-school laptop, this device is PIN protected.

The committee are aware of their responsibilities to ensure confidentiality and data security when managing the financial systems for the group. Devices used will be PIN/password protected.

Information is transferred off-site by the use of an encrypted usb flash drive.

Electronic devices such as the laptop, phone, camera(s) and usb flash drive will be securely stored when not in use.

Notice of breach of security

We will notify you if there was a breach of your personal information. If a security breach causes an unauthorised intrusion into our system that materially affects you or your information, then we will notify you as soon as possible and later report the action we took in response.

Data retention

Retention periods for the data held are determined by statutory requirements or contractual obligations. A complete list of the data held by GEP is contained in the appendices. These tables provide information about the legal basis for collecting the information, the retention period and supporting legislation.

Once data is no longer required then it is securely disposed of.

Data disposal

Data disposal is the responsibility of the Charity trustee nominated by the management committee of the management committee/Supervisor who will be provided with guidance on retention.

Physical documents must be destroyed through shredding or incineration.

Electronic documents will be destroyed by secure data shredding.

Redundant devices will be securely disposed of.

This procedure was adopted at a meeting of Grindleford and Eyam Playgroup

Held on:

Date to be reviewed:

Signed on behalf of the committee:

Name of signatory:

Role of signatory:

All staff members and committee members will sign to indicate they have read, understood and agreed with the above policy.