

# Fun 4U Club

## 10 Data Protection Policy & Procedures (Post GDPR)

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### Principle

In order to work effectively Fun 4U Club needs to gather information about staff, parents, children and professionals involved in the day to day running of the club. This personal information must be handled and dealt with properly, however it is collected, recorded and used. Information may be gathered on paper, computer records or recorded by any other means. By adhering to the policy we will ensure that data is handled properly and confidentially at all times.

### Statement of Intent

- Comply with 2018 Data Protection Act (DPA) and any subsequent relevant legislation
- We endorse and adhere to the principles of the GDPR Regulation 25<sup>th</sup> May 2018
- Any guidance or update to this policy notified by Early Years Organisation.
- We will ensure that we treat personal information lawfully and correctly
- This policy applies to staff past and present, volunteers, students, enrolment data which includes children's details as well as parents and careers details.

### Procedure

- Personal data is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.
- Special categories of personal data are data which relates to an individual's health, sex life sexual orientation, race, ethnic origin, political opinion, religion and trade union membership. It also includes genetic and biometric data ( where used for ID purposes)
- Criminal Offence Data is data which relates to an individual's criminal convictions and offences
- Data Processing is any operations or set of operations which is performed on personal data or on sets of personal data whether or not by automated means such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, alignment or combination, restriction, erasure or destruction.

### Under GDPR Fun 4U Club will ensure all data held will be

- Processed fairly and transparently
- Collected for specific ,explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for the purpose of processing
- Data will be kept accurate and up to date, data found to be inaccurate will be rectified or erased without delay
- Data is not kept for longer than it is legally required or for its necessary given purpose
- Processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful and accessing, accidental loss, destruction or damage by using appropriate technical or organisational measures
- Compliant with the relevant GDPR procedures for international transference of personal data
- Types of data held by Fun 4U Club are personal data of our customers i.e. children and parents enrolled for our services, staff details and data and any students or volunteers within the organization.
- Data held includes, name ,DOB, address phone numbers , e mail addresses, childcare voucher details and emergency contact details for each child and each staff member
- Information gathered upon recruitment such as details in a CV or included on a cover letter references from past or present employers, details on employee's educational background and past employment history etc.
- Tax codes ,national insurance ,bank details relating to pay details
- Medical or health information of both children and staff
- Job descriptions job title and salary details
- T & C's of employment and enrolment of children
- Staff details of formal &informal proceedings such as letters of concern disciplinary and grievance proceedings, your annual leave records sick leave appraisal and supervision information
- Internal & external training modules attended

## **Employee and Customer Rights**

- All employees and customers have the right to view the personal data Fun 4U Club hold relating to them.
- The right to be informed about the data held about you and how it is used.
- The right of access to the data about you
- The right for any inaccuracies however they come to light about you to be corrected. This is also known as "RECTIFICATION"
- The right to have certain data deleted in certain circumstances. This is also known as "ERASURE"
- The right to restrict the processing of the data
- The right to transfer the data held about you to another party. This is also known as "PORTABILITY"
- The right to object to the inclusion of any information
- The right to regulate any automated decision-making and profiling of personal data
- In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policy on data protection.

## **Lawful Bases of Processing**

Fun 4U Club acknowledge that processing will only be carried out where a lawful basis for that processing exists and have assigned a lawful basis against each processing activity.

## **Access to Data**

- Staff has the right to see all data held about them and can exercise their right to view all said data at all times.

## **Data disclosure**

- Fun 4U Club is required by Social Services to disclose all employees' names and address at times of inspection and also Parents Contact details at said time of inspection to forward questionnaires about the service provided. Hard copies of this data are always to be stored within a locked cabinet and any data within computers has to always be password protected.

## **Requirement to Notify Breaches**

- All data breaches will be recorded on our data Breach register. Where legally required, Fun 4U Club will report a breach to the INFORMATION COMMISSIONER within 72hrs of discovery. In addition, where legally required notify the said person whose data was subject to breach.

## **Records**

- Fun 4U Club keeps records of its employment processing activities. These records will be kept up to date and retained after termination of employment for the legally required five years.