



Record Keeping, Confidentiality and Data Protection Policy and Privacy Notice

Record Keeping

As part of the requirement for providing the Early Years Foundation Stage curriculum, records will be kept for each individual child, across the curriculum, with samples of their work in individual folders.

Records for individual children should be a positive way of identifying what children have achieved and what they understand and can do. Over a period of time they can also indicate how the children have progressed, the rate at which they have progressed and identify where children may need extending in their learning, or need further help.

Individual Records/Learning Journals

- Each child will have an individual folder (Learning Journal) which is a record of their progress, development and achievements during their time at Penhill Playgroup.
- The folders will be updated and shared regularly, at least once a term, with the children and parents/carers, by staff. This may be through an “Open session” where parents are invited to come into the setting and share a Playgroup experience with their child and staff members will make time to speak to them, or through arranging an appointment at a mutually convenient time.
- On occasion, it may be possible for the folders to go home and be shared with partners/family who are unable to attend the setting, but please speak to the Manager to arrange this first.
- Contents of the folder should record children’s progress and development in the prime and specific curriculum areas, including their Next Steps or Individual Plan. It may also include particular ‘milestones’ in a child’s progress, which may take the form of: samples of work; drawings; paintings; writing; photographs; comments; observations etc. and parents are welcome to contribute comments or a sample of work, comment about an incident, or occasion from home to the folder.
- The information within the folder will be used to inform parents/carers of their child’s progress and, when appropriate and with parental consent, shared with other professionals who may be supporting the child’s learning and development.
- The folders will be passed to the parents/carers when the child leaves the group, unless the receiving school wishes to see them, with agreement from the parents/carers, in which case the school will then pass them on to the parents/carers.

Confidentiality

The Playgroup's work with children and families will sometimes bring us into contact with confidential information. To ensure that all those using and working in the Playgroup can do so with confidence, we will respect confidentiality in the following ways, with regard to the General Data Protection Regulations 2018 and the Freedom of Information Act 2000.

- Parents will have ready access to the files and records of their own children but will not have access to information about any other child.
- Staff will not discuss individual children, other than for purposes of curriculum planning/group management, with people other than the parents/carers of that child, unless they have parental permission.
- Information given by parents/carers to the Playgroup leader or other members of staff, will not be passed on to other adults without permission, unless there is a safeguarding concern.
- Confidential information about staff, whether paid or unpaid, will be held securely and only made accessible or available to those who have a right or professional need to see it, such as those directly involved with making personnel decisions.
- Any information, including anxieties or evidence relating to a child's personal safety, including any Records of Concern, will be held securely and only made accessible or available to those who have a right or professional need to see it.
- Staff/students must keep their mobile phones with their personal belongings and not on their person during Playgroup sessions. Only Playgroup cameras should be used for taking photographs of the children as evidence of their learning and development and only once we have obtained parental consent.
- Parents/carers should not use their personal cameras or mobile phones to take pictures in the setting, unless permission has been given and should refrain from using their mobile phones whilst on the premises.
- Staff/Students should not put identifiable comments about the setting, including comments about other staff, visitors, parents or children on any web sites or social networking sites. Please see our Social Media Policy for further guidance.
- Records and information about the children will be held securely for the recommended period of time (3 years after the child has left the setting for children's records and registers and until the child is 24 for accident, medication and child protection information)
- Visitors or students observing in the Playgroup will be advised of this Policy and required to respect it.
- All the undertakings above are subject to the paramount commitment of the Playgroup, to the safety and wellbeing of the children in our care. Please also see our Safeguarding and Child Protection Policy and Procedures.

Data Protection Policy Statement

In order to carry out its function of providing care and education for young children, Penhill Playgroup is required to collect personal data, including some sensitive personal data, about the children attending the Playgroup and their parents/carers and family.

As an employer and Registered Charity, Penhill Playgroup is required to collect personal data about its staff, volunteers and Trustees (Committee Members) in order to fulfil its legal obligations.

At Penhill Playgroup, we want our staff, committee, parents, carers and children to feel safe in the knowledge that the information they give us about themselves or their children, remains secure and confidential and will not be shared, without consent, with other parties, unless by not doing so, would put a child at risk of harm.

Legal Basis for the Policy

General Data Protection Regulations 2018 and Freedom of Information Act 2000

Your Personal Data – what is it?

Personal data is information about a living individual who can be identified from that information.

Sensitive Personal Data is information about a person's racial or ethnic origin; his/her political opinion; his/her religious or other beliefs; whether he/she is a member of a trade union; the person's physical or mental health; his or her sexual life; the commission or alleged commission by him or her of an offence; any proceedings for any offence committed, the disposal of such proceedings or the sentence of any court in such proceedings.

How do we process (use) your personal data?

The information on the Registration Forms is used to help us plan ahead for the child's entry into the setting. It provides the emergency contact information needed and details of who has Parental Responsibility for the child, which we are legally required to collect. All registration forms are kept securely in a locked cupboard, but can be accessed by all members of staff. The child's full name and date of birth are taken from the Registration form and used in password protected computer files in order to plan sessions and claim funding and the email addresses provided for all parents/carers are held on a password protected email system in order to be able to contact all parents by email, as appropriate, although if a whole group email is sent out, it will be done so that other parents cannot see each other's names or email addresses. Parents/carers are expected to inform the Manager of any changes to the information contained in the Registration Form (names, addresses, telephone numbers, email addresses, allergies and medical information etc.) and regular reminders about this are sent out in newsletters.

Information given in the child's Learning Journal is used to help with understanding and assessing the child's interests, skills and abilities and to plan meaningful and challenging activities to develop them further. The Learning Journals are kept accessible during each

session, but locked away securely overnight. Occasionally, staff will take Learning Journals home to update and plan from. All staff are aware of keeping the children's personal information safe and have read and understood our Record Keeping, Confidentiality and Data Protection Policy. At the end of the child's time with us, these Learning Journals will then be passed on to the child's parent/carer, unless (with parental permission) the child's receiving school or setting wishes to see them or retain information from them to help with planning a suitable transition for the child. The school/setting will then arrange to pass Journals or information back to the parents/carers at an appropriate time. If the child is not attending any other setting, the Journal will be passed straight to the parents/carers of the child. In order to assist with monitoring the overall development of the children in our care and to track their progress, information from each child's Progress Review Sheet is added to a paper-based cohort tracking system, by the Manager.

A Safeguarding file, listing all the registered children is also kept and contains details of any Safeguarding concerns that arise. This file is kept in a locked cupboard, accessed only by the two Designated Safeguarding staff.

The Free Entitlement Funding Form information is used to access the Free Entitlement funding. All forms are kept locked securely in a cupboard, with copies sent to West Sussex for children who receive funding at more than one setting, and as requested by the Council. The information from the forms is sent electronically to West Sussex, each term, via password protected accounts and databases and West Sussex issue their own Privacy Notice explaining what they use the information for. You will have been offered a copy of this at the time of filling in the form. Please ask if you would like a copy to read or keep.

Permission Forms for outings are kept in the Outings file, which is kept locked overnight. The forms are taken on each outing, along with emergency contact details for staff members and then returned to file once the outing has finished.

Steering Committee Members - the information you provide to the Secretary with your contact information, is shared with all committee members and is also kept on the useful contacts sheet next to the telephone in the Playgroup resources cupboard, which is kept locked overnight, but can be accessed by all staff during opening hours. The Secretary uses password protection to access/update your contact details electronically. As Trustees of the Playgroup, committee members' personal details are also required to be made available to the Charity Commission and the Manager uploads this information electronically via a password protected system. Committee members are expected to contact the Secretary to let her know of any changes to their personal data, but will be asked to check the information is accurate at least annually.

Staff Members - Staff personal data is kept in the staffing file, which is kept locked overnight. It is accessible to the Manager and Individual Members of staff may access their records at any time. This information is updated at least annually and the manager keeps a copy of the emergency contact details to take off site, should staff or their next of kin need to be contacted out of hours, or whilst we are on an outing. Staff information is also shared with the Local Authority in order to be able to access training and support. The information is shared electronically using password protected databases. The Treasurer also has access to some personal staff data in order to be able to pay wages. This information is held electronically and is password protected. Staff members are expected to inform the Manager/Treasurer of any changes to their personal data.

What is the legal basis for processing your personal data?

The Early Years Foundation Stage Statutory Framework requires us to obtain information about a child's full name, date of birth, name and address of every parent/carer who has parental responsibility for the child, which parent or carer the child normally lives with and emergency contact details for each parent/carer.

Early Years settings must hold the name, home address and telephone number of any person employed on the premises and of anyone who will be in regular, unsupervised contact with the children, along with information about staff qualifications and the identity checks and vetting processes that have been completed (including the DBS check reference number, the date it was obtained and details of who obtained it).

We are also required to keep a daily record of the children being cared for (our Register) and details of any accidents or incidents that occur (recorded in our Accident book or Incident book) and details of any medication that parents have given permission to be administered (recorded on our Permission to administer medication form) along with a record of any medication that has been administered and by whom (recorded in our Administration of Medication book).

Ofsted also require us to inform parents/carers of any impending Inspections and to provide copies of the Inspection Report, when complete, which is done via email, where possible.

Sharing your personal data

Unless we have your consent, your personal data will not be shared with anyone else, unless there is a serious safeguarding concern. When you sign the Registration forms, you are giving us permission to use your information to contact you about Penhill Playgroup. This may be to send you copies of the newsletter, to inform you of events going on or to contact you about your child.

When signing the Free Entitlement Funding Form, you are giving permission for us to share this information with West Sussex County Council in order to obtain funding for your child to attend Penhill Playgroup. West Sussex have their own Data Protection Policy and Privacy Notice which you will have been made aware of when filling in the Free Entitlement Claim Form.

How long do we keep your personal data?

Please see Appendix 1, the Retention Periods for Records produced by the Pre-School Learning Alliance, which we follow. In addition to this, as a condition of accessing the Free Entitlement, we are obliged to hold on to registers and funding information for up to 3 years after a child has left the setting.

Copies of old registers, paperwork, Accident and Incident books are kept in a filing cabinet inside a locked cupboard. Once the retention period for the records has ended, they will be securely disposed of, by shredding or incinerating.

Your rights as a data subject

As a data subject, you have the right to ask for a copy of any information we hold about you or your child. If you would like a copy of the information we hold, please contact the Manager at the address given below. We may make a small charge for this service.

We want to ensure that your personal information is accurate and up-to-date. You may ask us to correct or remove any information you think is inaccurate.

Contact Details

If you have any questions, comments or complaints, or wish to exercise your right to request a copy of your personal data, please contact the Manager, Penhill Playgroup, Guide Hall, 5 Penhill Road, Lancing, BN15 8HA or Tel. 01903 767513 or email: supervisor@penhillplaygroup.org.uk

You can also contact the Information Commissioner's Office by telephone on 0303 123 1113, or write to them at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

This Policy was adopted at a meeting of the Penhill Playgroup Steering Committee on May 9th 2018.

This Policy will be reviewed at least annually.