

Penrhyn Church in Wales V.C School Playgroup

Confidentiality Policy

Penrhyn Church in Wales V.C School Playgroup work with children and families involves being aware of, recording and keeping sensitive and confidential information. This policy applies to all staff, volunteers, and students.

It is the policy of Penrhyn Church in Wales V.C School Playgroup to ensure that all who use and work in the provision can do so with confidence.

We respect the need for confidentiality by: ­

* Designating the Responsible Individual Mr Clive Condon as the lead person for information/communications sharing (Data Controller).
* Ensuring that parents have access to any files and records about their own children but do not have access to information about any other children
* Arranging to share information with parents who request it, in private
* Ensuring that issues to do with the employment of staff, volunteers and students, whether paid or unpaid, remain confidential to the people directly involved with making personnel decisions
* Enabling staff, volunteers and students to have access to their own files and records, but not to information about any other member of staff, volunteer or student
* Ensuring that staff, volunteers and students do not discuss concerns about individual staff members with anyone other than their delegated
* Ensuring that staff, volunteers and students sign that they have read, accept and implement this privacy and confidentiality policy at their induction
* Keeping all documents/forms and electronic data containing personal information securely in line with the Data Protection Act 1998 (this also applies to transporting personal information from place to place). Personal and confidential information and records are kept in a locked cabinet.
* Ensuring that confidential information is shared with other agencies only by Clive Condon has the authority to do so. In these circumstances the parents’ consent is obtained (except in cases where this may place a child at risk)
* Making available personal data to CIW as required by day care regulations
* Keeping records of concerns/information relating to children’s safeguarding confidential and in line with Penrhyn Church in Wales V.C School Playgroup child protection policy and the All Wales Child Protection Procedures
* Taking seriously any breach of confidentiality at Penrhyn Church in Wales V.C School Playgroup This is considered as gross misconduct that can lead to disciplinary action and dismissal
* Disposing of any information (that can be disposed of) responsibly, by shredding or burning.
* Ensuring any computer or electronic device holding personal data is wiped before it is passed onto a third party
* Obtaining parents’ consents before using cameras, or video recording equipment with their children.

**GDPR**

In addition to the statements above Penrhyn Playgroup will follow the principals set out below in relation to GDPR. These are an excerpt from the Data Protection Policy for the playgroup, which has adopted the school’s Data Protection Policy. See the Data Protection Policy for more information.

**Data Protection Principles**

In accordance with the Data Protection Act 2018, the playgroup has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of Personal Data;

# Principle 1: Lawfulness, Fairness and Transparency

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means that our school must tell the Data Subject what Processing will occur (transparency), the processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in 4.2 (lawfulness of processing).

# Principle 2: Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This means that our school must specify exactly what the Personal Data collected will be used for and limit the Processing of that Personal Data to only what is necessary to meet the specified purpose.

# Principle 3: Data Minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This means that our school must not collect or store Personal Data beyond what is strictly required.

# Principle 4: Accuracy

Personal Data shall be accurate and kept up to date. This means that our school must have in place processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.

# Principle 5: Storage Limitation

Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed. This means that our school must, wherever possible, store Personal Data in a way that limits or prevents identification of the Data Subject.

# Principle 6: Integrity & Confidentiality

Personal Data shall be processed in a manner that ensures appropriate security of Personal Data, including protection against unauthorised or unlawful Processing, and against accidental loss, destruction or damage. Our school must use appropriate technical and organisational measures to ensure the integrity and confidentiality of Personal Data is maintained at all times.

# Principle 7: Accountability

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| This **privacy and** **confidentiality** policy and procedurewas passed for use in Penrhyn Church in Wales VC School Playgroup  On: 16.10.20  By: C Condon Position: Responsible Individual  Date of planned review:16.10.21 |

The Data Controller shall be responsible for, and be able to demonstrate compliance. This means that our school must demonstrate that the six Data Protection Principles (outlined above) are met for all Personal Data for which it is responsible (this will include the use for Third Parties for processing purposes).