



Strawberry School Clubs

Wrap Around Care

Confidentiality and Client Access to Records Policy

Wrap Around Care =
St James Breakfast and After School Club
St Richard Reynolds Breakfast and After School Club
Twickenham Prep Wrap Club

Confidential information is information of some sensitivity, which is not already lawfully in the public domain or readily available from another public source, and which has been shared in a relationship where the person giving the information understood it would not be shared with others' (Information sharing guide)

At Strawberry Hill School Clubs, we recognise that we hold sensitive/confidential information about children and their families and the staff we employ. This information is used to meet children's needs, for registers, invoices and emergency contacts. We store all records in a locked cabinet or on the office computer with files that are password protected in line with data protection principles (See also GDPR policy) Any information shared with the staff team is done on a 'need to know' basis and treated in confidence.

Legal requirements

- We follow the requirements of the General Data Protection Regulation (Regulation (EU) 2016/679 (GDPR) and the Freedom of Information Act 2000 about the storage of data and access to it.

Procedures

It is our intention to respect the privacy of children and their families, and we do so by:

- Storing confidential records in a locked filing cabinet or on the office computer with files that are password protected
- Ensuring staff, student and volunteer inductions include an awareness of the importance of confidentiality and that information about the child and family is not shared outside of the Strawberry Hill Preschool and Wrap Around Care other than with relevant professionals who need to know that information. It is not shared with friends and family, discussions on the bus or at the local bar. If staff breach any confidentiality provisions, this may result in disciplinary action and, in serious cases, dismissal. Students on placement in the Strawberry Hill Preschool and Wrap Around Care are advised of our confidentiality policy and required to respect it
- Ensuring that all staff, volunteers and students are aware that this information is confidential and only for use within Strawberry Hill School Clubs and to support the child's best interests with parental permission
- If a child is identified as a child in need (section 17 of the Children's Act 1989 and 2004) we will, normally with the parents' permission, give appropriate information to referring agencies.

- We expect parents to inform us of any changes in the child's home circumstances, care arrangements or any other change which may affect the child's behaviour such as a new baby, parents' separation, divorce or any bereavement.
- Ensuring that parents have access to files and records of their own children but not to those of any other child, other than where relevant professionals such as the police or local authority children's social care team decide this is not in the child's best interest
- Ensuring all staff are aware that this information is confidential and only for use within the Strawberry Hill School Clubs. If any of this information is requested for whatever reason, the parent's permission will always be sought other than in the circumstances above
- Ensuring staff do not discuss personal information given by parents with other members of staff, except where it affects planning for the child's needs
- Ensuring issues concerning the employment of staff remain confidential to the people directly involved with making personnel decisions
- Ensuring any concerns/evidence relating to a child's personal safety are kept in a secure, confidential file and are shared with as few people as possible on a 'need-to-know' basis. If, however, a child is considered at risk, our safeguarding/child protection policy will override confidentiality as required by law.
- All accidents are recorded in an accident book. All accidents and injuries will be reported to the company providing our public liability policy, however trivial, to enable a claim number to be allocated.
- All significant incidents are recorded in an incident book and will be shared and discussed with parents so that together we can work to resolve any issues.
- Ofsted may require to see records at any time
- We expect parents to inform us of any changes in the child's home circumstances, care arrangements or any other change which may affect the child's behaviour such as a new baby, parents' separation, divorce or any bereavement.

General Data Protection Regulation (Regulation (EU) 2016/679 (GDPR) compliance

In order to meet our requirements under GDPR we will also undertake the following:

1. We will ensure our terms & conditions, privacy and consent notices are easily accessed/made available in accurate and easy to understand language
2. We will use your data only for necessary reasons. We will not share or use your data for other purposes.
3. Everyone at Strawberry Hill School Clubs understands that people have the right to access their records or have their records amended or deleted (subject to other laws and regulations)
4. We will follow the '7 Golden Rules' taken from the DSCF Sharing Information document and would seek legal advice from a professional body if further guidance is needed.

Access to records procedure:

Parents may request access to any confidential information records held on their child and family by asking the Management to view the information. Individual staff may request to see their own personal file at any time.

The seven golden rules for sharing information

- Remember that the General Data Protection Regulations (GDPR), Data Protection Act 1998 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. Under the GDPR and Data Protection Act 1998, you may still share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
- Consider safety and wellbeing: Base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Reviewed October 2023