

## Data Privacy Notice

### St Joseph's Nympsfield Out of School Club and Your Personal Data

We need to keep certain personal information about parents and children who use our services in order to fulfil our contractual obligations and deliver the wrap around care for those children currently attending St Joseph's Catholic Primary School, or are in their final pre-school year at St Joseph's Pre-school before moving to Primary School. Under the Childcare Acts 2006 and 2016, we are required to adhere to the requirements contained within the Early Years Foundation Stage (EYFS) framework together with the DfE's guidance "Keeping Children Safe in Education" (KCSiE) and "After-school clubs, community activities and tuition: safeguarding guidance for providers". From 25 May 2018 the processing of this personal information is governed by the General Data Protection Regulation (GDPR) 2018.

We only collect personal data when we have a lawful reason for doing so, and we only use it for the purpose it was originally obtained for. We take steps to ensure that the data we keep is accurate, up to date and secure, and we do not keep it for any longer than is necessary. We have written policies and procedures in place for dealing with personal data, including breaches of security, and our staff have appropriate training and awareness of data protection principles and procedures.

St Joseph's Nympsfield Out of School Club are a Data Controller for your personal data, which means that we decide what information we need to keep about you and why, and how we process and store that information.

### What personal data do we keep and process?

St Joseph's Nympsfield Out of School Club will collect only the personal information we need to perform our functions. When you register your child to attend the Club you are required to register via our online booking system<sup>1</sup> and this includes personal data. Personal data can only be viewed and processed by relevant staff and/or committee members who have access to the online booking system. Data about children is classified as 'sensitive' and we take extra care to keep it safe.

Kids Club HQ have their own privacy agreement which can be viewed [here](#).

### What do we use your personal data for?

St Joseph's Nympsfield Out of School Club will use the information about you and your child to enable us to comply with EYFS and KCSiE.

We will use the contact details you give us to get in touch with you via telephone, email and via your child's book bag. This is so we can send you information about your child, the Club and other relevant news. Also, so we can communicate with you regarding payment of fees.

### How is your personal data stored?

Your personal data is stored in the following ways:

- Kids Club HQ system (online booking system) (electronic format): access is password protected for both parents/carers and staff/committee, with different levels of access

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<sup>1</sup> Kids Club HQ

dependent on their needs (eg. the Play Leader has access to add late collection charge to accounts);

- Accident records (physical format): kept in a building with secure access. Full accident records are kept in a locked cupboard within the building.

### **What is the legal basis for processing your personal data?**

Our legal basis for processing the personal information relating to you and your child is that we can fulfil our contract with you.

### **How long do we keep your personal data for?**

St Joseph's Nympsfield Out of School Club will keep your personal data as long as

- you and your child have an account on the online booking system; and
- your child is attending either St Joseph's Catholic Primary School or St Joseph's Pre-school.

Data that is no longer required is erased after your child has ceased attending our Club, ie. when they leave St Joseph's Catholic Primary School or St Joseph's Pre-school for another school/setting. However, we are required to keep some data because of statutory regulations<sup>2</sup>. All personal data is kept securely with limited access<sup>3</sup>. You can see our retention of records policy for more details<sup>4</sup>.

### **Who do we share the information with?**

St Joseph's Nympsfield Out of School Club will only share personal information about you or your child with another organisation if we:

- have a safeguarding concern about your child;
- are required to by government bodies or law enforcement agencies;
- engage a supplier to process data on our behalf (eg. to issue invoices, provide the online booking service);
- have obtained your prior permission (written and/or verbal), unless there is a specific safeguarding issue which allows us to bypass this<sup>5</sup>.

When you register with the online booking system we ask for your specific permission to take photographs of your child for use on our Facebook page or on the website.

### **What are your rights with regard to your personal data?**

Under the GDPR you have the right to:

- know what personal data we keep about you;
- request a copy of the personal data we hold about you<sup>6</sup>;
- request that we correct any personal data which is found to be inaccurate or out of date;
- request that we erase any personal data where it is no longer necessary for us to keep that data;
- request us to transmit the personal data that we hold about you to another data controller.

(This right only applies where the processing we do is by your consent or for the processing of a

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<sup>2</sup> Section 3 of the EYFS

<sup>3</sup> See 5.3: Data Protection

<sup>4</sup> See 5.6 Retention Periods for Records

<sup>5</sup> See 1.2: Safeguarding and Child Protection

<sup>6</sup> See 5.4 : Data Subject Access Requests

contract, and where that processing is by automatic means);

- withdraw your consent for processing to which you have previously given your consent. (Please note that if you do this
  - we will not be able to continue to care for your child if we do not have sufficient information about them;
  - even after your child has left our care, we have a statutory duty to retain some types of data for specific periods of time, so cannot delete everything immediately.

### **Who to contact**

If you have any queries or complaints, or wish to exercise any of the above rights, please contact our

Data Protection Lead via email on [chairroosc.st.josephs@gmail.com](mailto:chairroosc.st.josephs@gmail.com), or write to the Club Chair, St Joseph's Nympsfield Out of School Club, Front Street, Nympsfield, Stonehouse, Gloucestershire GL10 3TY. We will respond to your request within 30 days from the initial date of the request even if this was via telephone or in person.

### **Making a complaint to the Information Commissioner**

If you wish to make a complaint about how we use your personal data to the Information Commissioner Office (ICO), you can contact them by visiting their website at <https://ico.org.uk/> or by calling 0303 123 1113.

St Joseph's Nympsfield Out of School Club is not currently registered with the ICO.

### **St Joseph's Nympsfield Out of School Club's policies and procedures**

You can access copies of all the Out of School Club's current policies and procedures, including those referenced in this Privacy Notice, via the Club's section of St Joseph's Catholic Primary School's website (click link [here](#)).