



Policy reviewed on 21.03.2017

Data Protection policy

Aims:

The Exwick Ark complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of personal information.

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust. The Exwick Ark complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and disclosure information.

DBS Disclosure information.

Procedure:

Storage and Access

Disclosure and personal information should be kept in lockable, non portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 122 Part V of the Police Act 1997 Disclosure Information is only passed to those who are authorised to receive it in the course of their duties. Only the Managers of the setting see Disclosures or the information they reveal. It is a criminal offence to pass on this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the purpose for which it was requested and for which the applicant's full consent has been given (by them filling in a Disclosure Application).

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information any longer than is necessary. This may be up to but no longer than six months. This is to allow for the consideration and resolution of any disputes or complaints. If in very exceptional circumstances it is considered necessary to keep the disclosure Information for longer than six months, we will consult the DBS about this and will give full consideration to the data protection and human rights of the individual before doing so. Through out this time, the usual conditions regarding the storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed we will ensure that any Disclosure information is immediately destroyed by secure means i.e. by shredding pulping or burning. While awaiting destruction Disclosure information will be kept secure. We will not keep any copy of the Disclosure. However, notwithstanding the above we may keep a record of



the date of issue of a Disclosure, the name of the subject, the type of disclosure requested, and the position for which the disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

Data handling

The Exwick Ark is registered with the Information Commissioners Office for handling data on staff and children. Data on children is kept to enable the Exwick Ark to provide the best education and childcare for that family. Information on staff is kept to allow the Exwick Ark to fulfil it's duties under PAYE schemes, to provide professional development and to share information with the staff team.

It is sometimes necessary to share information with other agencies and permission is always gained first unless to get this permission first would put a child at risk of harm.

Staff are occasionally given information about children via e-mail. All staff computers are password protected. Where e-mailed information contains personal details about a child, staff delete the information from their computer once they have used it. When updated information is sent to staff a reminder is also issued to delete old files. Staff are also asked to remove the file from the recycle box on their computer. If staff have any sensitive data on paper they are asked to shred it once they have finished using it. Minutes of meetings are sometimes e-mailed to staff. When these contain sensitive materials staff are asked to delete them once they have finished with them.

When information containing personal data is e-mailed out to staff and a staff member feels that there may have been a problem with the transfer of the data (perhaps it has not arrived or they suspect that somebody else has opened the file already) it should be reported immediately to Harri Sharp. Having ascertained the problem, where necessary, advice will be sought from ICO (Tel 08456 3036060 or 01625 545745) this includes information on staff, parents and children.

When communicating with parents we will ask them how they would like to be communicated with. They will only have personal information e-mailed to them if they wish to use this method. This could include invoices, reports on their children or information held on their child for them to check.

Signed: