

GDPR AND RECORD KEEPING POLICY



KICKSTART COACHING UK LTD

**GENERAL DATA PROTECTION REGULAION (GDPR) AND
RECORD KEEPING POLICY**

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GENERAL DATA PROTECTION REGULATION

POLICY STATEMENT:

WE RECOGNISE THAT PARTNERS HAVE A RIGHT TO KNOW THAT THE INFORMATION THEY SHARE WITH US WILL BE REGARDED AS CONFIDENTIAL, AS WELL AS TO BE INFORMED ABOUT CIRCUMSTANCES WHEN AND WHY WE ARE OBLIGATED TO SHARE INFORMATION

WE RECORD AND SHARE INFORMATION ABOUT CHILDREN AND THEIR FAMILIES (DATA SUBJECTS) IN LINE WITH THE SIX PRINCIPLES OF THE DATA PROTECTION REGULATIONS (GDPR, 2018) WHICH IS FURTHER EXPLAINED IN OUR PRIVACY NOTICE THAT IS GIVEN TO PARENTS AT THE POINT OF REGISTRATION. THE SIX PRINCIPLES STATE THAT PERSONAL DATA MUST BE:

1. PROCESSED FAIRLY, LAWFULLY AND IN A TRANSPARENT MANNER IN RELATION TO THE DATA SUBJECT
2. COLLECTED FOR SPECIFIC, EXPLICIT AND LEGITIMATE PURPOSES AND NOT FURTHER PROCESSED FOR OTHER PURPOSES.
3. ADEQUATE, RELEVANT AND LIMITED TO WHAT IS NECESSARY IN RELATION TO THE PURPOSE FOR WHICH THE DATA IS PROCESSED.
4. ACCURATE AND WHERE NECESSARY KEPT UP TO DATE.
5. KEPT IN A FORMAT THAT PERMITS IDENTIFICATION OF DATA SUBJECTS FOR NO LONGER THAN IS NECESSARY FOR THE PURPOSE IN WHICH THE DATA IS BEING PROCESSED.
6. PROCESSED IN A WAY THAT ENSURES APPROPRIATE SECURITY OF THE PERSONAL DATA INCLUDING PROTECTION AGAINST ACCIDENTAL LOSS, DESTRUCTION OR DAMAGE USING APPROPRIATE TECHNICAL OR ORGANISATIONAL MEASURES.

WE ARE OBLIGATED TO SHARE CONFIDENTIAL INFORMATION WITHOUT AUTHORISATION FROM THE PERSON WHO PROVIDED IT IF IT IS IN THE PUBLIC INTEREST, FOR EXAMPLE:

- TO PREVENT A CRIME FROM BEING COMMITTED, OR TO INTERVENE WHEN ONE MIGHT OCCUR.
- PREVENT HARM TO A CHILD OR ADULT.
- NOT SHARING COULD RESULT IN A WORSE OUTCOME.

GROUP PROVISION – THE RESPONSIBILITY FOR DECISION MAKING SHOULD NOT RELY ON ONE INDIVIDUAL. DECISIONS SHOULD BE MADE AS

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GROUP (KICKSTART COACHING UK LTD MANAGEMENT TEAM). THE MANAGEMENT TEAM WILL PROVIDE CLEAR GUIDANCE IN REGARD TO POLICIS AND PROCEDURES TO ENSURE ALL STAFF UNDERSTAND THEIR INFORMATION SHARING RESPONSIBILITIES AND ARE ABLE TO RESPOND IN A TIMELY AND APPROPRIATE WAS WHEN IDENTIFYING AND SAFEGUARDING CONCERNS.

PROCEDURES:

OUR PROCEDURE IS BASED ON THE GDPR PRINCIPLES AS LISTED ABOVE AND THE SEVEN GOLDEN RULES FOR SHARING INFORMATION, AS SHOWCASED IN THE INFORMATION SHARING ADVICE FOR PRACTITIONERS PROVIDING SAFEGAURDING SERVICES TO CHILDREN, YOUNG PEOPLE, PARENTS AND CARERS. WE ADDITIONALLY FOLLOW GUIDANCE ON INFORMATION SHARING FROM THE LOCAL SAFEGUARDING CHILDREN BOARD.

1. REMEMBER THAT THE GENERAL DATA PROTECTION REGULATIONS 2018 AND HUMAN RIGHTS LAW ARE NOT BARRIERS TI JUSTIFY INFORMATION SHARING AS PER THE CHILDREN ACT 1989 BUT PROVIDE A FRAMEWORK TO ENSURE PERSONAL INFORMATION IS SHARED APPROPRIATELY.
2. OUR POLICY AND PROCEDURES ON INFORMATION BOTH WITHIN THE SETTING AS WELL AS WITH EXTERNAL AGENCIES.
3. BE OPEN AND HONEST WITH THE INDIVIDUAL (AND/OR THEIR FAMILY WHERE APPROPRIATE) FROM THE OUTSET ABOUT WHY, WHAT AND HOW INFORMATION WILL BE SHARED AND SEEK THEIR CONSENT, UNLESSIT IS UNSAFEOR IF WE HAVE A LEGAL OBLIGATION TO DO SO. A PRIVACY NOTICE IS GIVEN TO PARENTS AT THE POINT OF REGISRATION TO EXPLAIN THIS FURTHER.

SEEK ADVICE FROM OTHER PRACTITIONERS IF YOU ARE IN ANY DOUBT REGARDING SHARING INFORMATION CONCERNED, WITHOUT DISCLOSING THE IDENTITY OF THE INDIVIDUAL.

- FOR GROUP PROVISION – OUR MANAGERS REGULARY SEEKS ADVICE AND SUPPORT FROM THEIR LINE MANAGER ABOUT SIGNIFICANT HARM TO AN INDIVIDUAL.
- FOR GROUP PROVISION – OUR SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICY SETS OUT THE DUTY OF ALL MEMBERS

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OF STAFF TO REFER CONCERNS TO OUR MANAGER OR DEPUTY, WHO WILL CONTACT CHILDRENS SOCIAL CARE FOR ADVICE WHERE THEY DOUBT OR ARE UNSURE.

- OUR MANAGERS SEEK ADVICE IF THEY NEED TO SHARE INFORMATION WITHOUT CONSENT TO DISCLOSE.
- WE BASE DECISIONS ON SHARING CONFIDENTIAL INFORMATION AROUND IF THERE IS A LEGAL OBLIGATION, AND IF THERE IS IMIIDIATE DANGER.
- OUR GUIDELINES FOR CONSENT ARE PART OF THIS PROCEDURE. OUR MANAGER IS CONVERSANT WITH THIS AND IS ABLE TO ADVICE STAFF ACCORDINGLY.
- CONSIDER SAFETY AND WELL BEING – BASE YOUR INFORMATION SHARING DECISIONS ON CONSIDERATIONS OF SAFETY AND WELL BEING OF INDIVIDUAL AND OTHERS WHO MAY BE AFFECTED BY THEIR ACTIONS.

IN OUR SETTING WE:

- RECORD CONCERNS AND DISCUSS THESE WITH OUR DESIGNATED OFFICER FORM THE MANAGEMENT TEAM FOR CHILD PROTECTION MATTERS.
- RECORD DECISIONS MADE AND THE REASONS WHY INFORMATION WILL BE SHARED AND TO WHOM.
- FOLLOW THE PROCEDURES FOR REPORTING CONCERNS AND RECORD KEEPING AS SET OUT IN THIS POLICY.

LEGAL FRAMEWORK:

- GENERAL DATA PROTECTION REGULATIONS (GDPR, 2018)
- HUMAN RIGHTS ACT (1998)

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RECORD KEEPING

PURPOSE:

THIS POLICY IS IN PLACE TO PROVIDE INFORMATION RELATING TO THE LENGTH OF TIME NECESSARY FOR KEEPING RECORDS.

SCOPE:

THIS POLICY COVERS ALL DOCUMENTS STORED BY KICKSTART COACHING UK LTD, MOST IMPORTANTLY THOSE RELATING TO:

- COMPLAINTS – KEPT FOR 3 YEARS
- CHILDRENS PERSONAL RECORDS – KEPT FOR 3 YEARS FROM DATE OF LEAVING
- STAFF RECORDS – KEPT REQUIRED BY CURRENT LEGISLATION
- ACCIDENT / INCIDENT FORMS – KEPT FOR 40 YEARS
- PHOTOS / VIDEOS (MEDIA) – MUST HAVE CONSENT, USED FOR ADVERTISEMENT PURPOSES ONLY (KEPT FOR A MAXIMUM OF 2 MONTHS)

RECORDS:

IN ACCORDANCE WITH EARLY FOUNDATION STAGE, WE KEEP RECORDS OF:

- ADULTS AUTHORISED TO COLLECT CHILDREN FROM CLUB.
- THE NAME, ADDRESSES AND TELEPHONE NUMBERS OF EMERGENCY CONTACTS IN CASE OF CHILDRENS ILLNESS OR ACCIDENTS.
- THE ALLERGIES, DIETARY REQUIREMENTS AND MEDICAL HISTORY OF INDIVIDUAL CHILDREN.
- ATTENDANCE OF CHILDREN, STAFF, VOLUNTEERS AND VISITORS AT ANY KICKSTART COACHING UK LTD SPORTS PROVISION.

METHODS:

RECORDS ARE KEPT SECURELY ON SITE AND ARE EASILY ACCESSIBLE TO THOSE WHO NEED THEM. RECORDS ARE NOT KEPT FOR LONGER THAN IS

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NECESSARY, TO THE PURPOSE FOR WHICH THEY WERE ORIGINALLY STORED. ONCE A CHILD HAS LEFT THE CLUB, THEIR PERSONAL RECORDS ARE KEPT ON SITE FOR 3 YEARS AND THEN DESTROYED.