where children play, grow and flourish

CONFIDENTIALITY & DATA PROTECTION POLICY

Document Reference:	CC-CDPOL-001
Setting Name:	Clwb Carco
Legal & Governance Body:	Charitable Incorporated Organisation (CIO) Board of Trustees
Lead Responsible Individual:	Person in Charge (Club Manager)/ Deputy Person in Charge
Provision:	After School Play Provision (Ages 3–11)
Date Adopted:	October 2026
Planned Review Date:	October 2027

CLWB CARCO: CONFIDENTIALITY & DATA PROTECTION POLICY

1.0 Policy Statement & Purpose

At Clwb Carco, the safety, privacy, and well-being of every child are of paramount importance. In our daily operations, we collect and process confidential personal data regarding children, parents/carers, staff, and volunteers. Clwb Carco is committed to respecting and protecting confidentiality in accordance with the Data Protection Act 2018 / UK GDPR, Care Inspectorate Wales (CIW) National Minimum Standards, and the Wales Safeguarding Procedures 2020.

2.0 Principles of Confidentiality

- All personal information regarding children, families, and staff is stored securely with restricted access.
- Parents/carers have the right to request access to records regarding their own child, but will never be granted access to information concerning any other child.
- Accident and incident records are maintained individually and stored separately to protect personal identities.
- Written parental permission is obtained prior to taking any photographs, videos, or media recordings of children in accordance with our Media Policy.
- Any anxieties or disclosures regarding a child's safety are treated with strict confidentiality and processed strictly in accordance with Clwb Carco's Child Protection Policy and the Wales Safeguarding Procedures 2020.
- Staff will not discuss individual children or family circumstances with external parties without explicit consent, unless required by law or child protection protocols.
- Personnel and employment records remain strictly confidential to those directly involved in management and personnel decision-making.
- All staff, trustees, and volunteers must read, sign, and implement this policy upon induction. Any breach of confidentiality will result in immediate investigation under Clwb Carco's Disciplinary Procedure.

3.0 Data Protection Principles & Statutory Compliance

Clwb Carco is registered with Care Inspectorate Wales (CIW) and the Information Commissioner's Office (ICO). As a registered provider, Clwb Carco is legally obligated to provide information to CIW officers upon request, which is not deemed a breach of confidentiality. Personal data is processed in accordance with the 8 core principles:

- Processed fairly, lawfully, and transparently.
- Obtained only for specified, explicit, and legitimate childcare operational purposes.
- Adequate, relevant, and limited strictly to what is necessary.
- Accurate and kept up to date.
- Retained no longer than necessary for designated purposes.
- Processed in accordance with the legal rights of data subjects.
- Protected by robust technical and organizational security measures.
- Transferred outside the UK/EEA only where adequate protection levels exist.

4.0 Document Retention & Destruction Schedule

Clwb Carco enforces clear retention schedules to comply with statutory and insurance requirements:

Record Category	Retention Period
Child Records & Registration Forms	Retained securely for 3 years after the child's last attendance date.
Staff & Volunteer Personnel Records	Retained for a minimum of 3 years post-employment termination.
Financial Accounts, Receipts & Minutes	Stored safely for 7 years for audit/tax compliance.
Employers' Liability Insurance Certificates	Retained permanently / minimum 40 years as legally required.
Accident & Incident Records	Retained for 21 years.

5.0 Data Security Measures

- Paper records are locked in secure filing cabinets with restricted key access on school grounds.
- Electronic systems, registers, and digital devices are protected via strong password authentication.
- USB memory sticks or external media must be fully encrypted. Unencrypted drives are strictly prohibited.
- Obsolete paper documents containing personal data are destroyed securely via cross-cut shredding or certified disposal through confidential waste.
- Digital devices scheduled for recycling or disposal are permanently sanitised to remove all residual data.
- All information will be collected, stored and disposed of in accordance with the UK GDPR, the Data Protection Act 2018 and safeguarding requirements.
- When information is no longer required it will be securely deleted.
- Magic Booking is compliant with the ICO and is password protected, staff will have individual sign on records

6.0 Digital Communications & Mobile Phone Policy

6.1 Mobile Phone Use by Staff

Staff personal mobile phones must be securely stored in designated lockers/bags during session hours. Personal mobile usage during work time is strictly prohibited without explicit line manager permission. Personal mobile devices or cameras must NEVER be used to photograph or record children under any circumstances.

6.2 Mobile Phone Use by Children

Children are not permitted to use mobile phones or personal smart devices at Clwb Carco. Any mobile phones brought to the setting must remain switched off inside bags. If a device is used during session time, staff will safely hold the item and return it directly to the parent/carer at sign-out.

6.3 Internet & Social Media Usage

- Staff accessing the internet for play activity planning must utilise secure, filtered networks.

- Official Clwb Carco communication must occur through official email channels; non-secure personal emails for sensitive child data are prohibited.
- Staff must not add parents/carers or children as contacts on personal social media accounts, nor comment on Clwb Carco operations publicly.
- Any action bringing Clwb Carco into disrepute online will lead to formal disciplinary procedures.

7.0 Policy Declaration & Staff Sign-off

All employees, trustees, and volunteers must sign below to confirm they have read, understood, and agree to adhere strictly to Clwb Carco's Confidentiality & Data Protection Policy.

Staff Name	Role	Signature	Date