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## Information Policy

This document consists of:

- Policy Statement
- Data protection
- The Eight Data Protection Principles
- Confidentiality
- Guidelines for current staff and volunteers
- Guidelines for ex staff and volunteers
- Data collection, processing and storage procedures
- Contacting members/members' parents
- Contacting members by phone
- Appendix

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Responsible person: S Beckman

Signed:

A handwritten signature in black ink, appearing to be "S Beckman", written over a horizontal line.

Date 20/05/23

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## 1. Policy Statement

Kids Kabin collects, processes/uses and stores a variety of types and amounts of information. This includes employee and volunteer details, member details and records of evaluation and incidents. Therefore it is essential that we have policies and procedures in place for data protection and confidentiality.

## 2. Data protection

Data protection legislation in Europe sets out rules for the storage and use of personal data.

The legislation provides for criminal prosecution of companies, individual managers and employees if those rules are breached.

This is a summary of the data protection policy of Kids Kabin. Everyone at Kids Kabin whose work involves the use of personal data must make themselves aware of the Kids Kabin policy.

### 3. The Eight Data Protection Principles

The UK data protection laws apply to “Personal Data”. This means any data which relates to living people, other than information where the people are kept anonymous. Kids Kabin will inform data subjects what we will use their data for and who we will share it with. This information policy will be on the Kids Kabin website policies section. The Privacy Notice will include data relating to employees, volunteers and members.

The following eight principles apply to such data:-

- 1) Personal data must be processed fairly and lawfully. For example, the processing of personal data may be unfair and unlawful if you fail to meet at least one of the following criteria:-
  - the individual consenting to the processing
  - the processing being required by law
  - the processing being necessary to protect the vital interests of the individual (life and death matters!).
- 2) Personal data shall be processed for limited purposes.

Examples of failing to process data for limited purposes would include:-

- disclosure of data to another organization where the individual is unaware that the information about them is to be passed to another organisation
  - disclosure which is incompatible with the reasons for which the data was obtained.
- 3) Personal data shall be adequate, relevant and not excessive.
  - 4) Personal data shall be accurate and, where necessary, kept up to date.
  - 5) Personal data should not be kept for longer than is necessary.

The practical consequences of principles 3, 4 and 5 can be summarised as follows:

- only the minimum amount of data necessary should be collected
- data should not be held unless you have a reason for holding it
- data will be inaccurate if it is incorrect or misleading about any fact
- information for which there is no necessity should be deleted

- 6) Personal data shall be processed in line with the data subjects’ rights.
- 7) Personal data should be kept secure.
- 8) Personal data shall not be transferred to countries outside the EU without adequate protection.

#### 4. Confidentiality

It is the responsibility of everyone to maintain confidentiality and ensure that data is kept and processed in accordance with data protection regulations. Therefore everyone at Kids Kabin will be informed of the following guidelines:-

Employees and volunteers must not divulge any confidential information which they may receive or obtain in the course of their work or involvement at Kids Kabin. All records, documents, or other materials of any description which come into their possession in connection with their involvement at Kids Kabin shall remain the property of Kids Kabin. If you suspect that there may have been a breach or that Personal Information may have been inadvertently lost or disclosed, the Manager should be informed immediately either in person or via email identifying it as a 'potential data incident'. This will initiate an initial investigation.

Confidential information shall include, but is not limited to the following matters: -

- Any information collected by Kids Kabin in relation to employees, volunteers, members or any other individual or group.
- Any information obtained during work related activities including board meetings, staff and volunteer meetings, meetings with external organisations, activity sessions, evaluation meetings, home visits.
- Any information overheard (e.g. phone calls, conversations)
- Any information relating to work which is held in electronic form including emails, electronic databases etc.

#### 5. Guidelines for current staff and volunteers

During involvement with Kids Kabin:-

- The specific data procedures will be followed (outlined below)
- Confidential information should not be taken away from the premises, unless essential. For example we take copies of consent forms on trips with us as we need medical details in case of emergency.
- This information will be kept carefully by a designated member of the staff and volunteer team.
- Information will be used appropriately to contact families by phone or carry out home visits.
- Staff to keep passwords to databases containing confidential information secure.

## 6. Guidelines for ex staff and volunteers

Once involvement with Kids Kabin has ended:-

- All individuals, employees and volunteers, are required to return to Kids Kabin any papers, documents, keys and property belonging to Kids Kabin.
- All individuals, employees and volunteers, are no longer permitted to represent themselves as being connected to Kids Kabin.
- All individuals, employees and volunteers must not use any confidential and personal information obtained during their involvement at Kids Kabin to facilitate ongoing contact with any of its members.
- All access to databases and electronic information will terminate when staff and volunteers leave Kids Kabin.

## 7. Data collection, processing and storage procedures

The table in the appendices (Appendix A) outlines the specific procedures we follow at Kids Kabin.

An audit log form will be used to carry out an internal audit to confirm everything that is being held/disposed of is in line with the storage procedures. This audit will take place every 2 years.

## 8. Subject Access Requests

All Subject Access Requests will be dealt with within 30 calendar days. A database will be used to log all requests from data protected subjects for access to, or changes to, the information held.

APPENDIX A

Area	What information?	What is it used for?	Where is it kept?	Who has access to it?	How long is it kept for?
Staff details	Personal contact details Emergency contact/next of kin details	Emergency contact	Office 1	Manager	For the duration of employment
	DBS details – name, date of application, application ref no., disclosure date and ref no.	Personnel management	On PC network	Manager and Business Support Manager	6 years after the individual has left Kids Kabin
	Employment details – contracts, references, sickness records	Personnel management	Office 1	Manager	6 years after the individual has left Kids Kabin
	Professional development and performance - training records, appraisals	Personnel management	Office 1	Manager	6 years after the individual has left Kids Kabin
	Recruitment information - Job application forms (unsuccessful candidates)	Staff selection	Office 1	Manager	6 months after selection date
Volunteer details	Personal contact details, Emergency contact/next of kin details	Emergency contact	Office 1	Manager	For the duration of volunteering
	References	Personnel management	Office 1	Manager	3 years after the individual has left Kids Kabin
	DBS details – name, date of application & ref no, disclosure date and ref no.	Personnel management	On PC network	Manager and Business Support Manager	3 years after the individual has left Kids Kabin
	Professional development and	Personnel management	Office 1	Manager	3 years after the individual

	performance - training records, appraisals				has left Kids Kabin
<b>Area</b>	<b>What information?</b>	<b>What is it used for?</b>	<b>Where is it kept?</b>	<b>Who has access to it?</b>	<b>How long is it kept for?</b>
Young people's details	Paper Membership forms - Personal contact details Emergency contact details, medical details	Emergency contact Medical emergency Activity planning	On shelf – Office 4 – is this still the case?	All staff and designated volunteers	3 years after the child has left Kids Kabin
	Membership details - Names, addresses, Dates of birth, postcodes, medical details	Monitoring and evaluation	On online database	All staff and designated volunteers	5 years after the child has left Kids Kabin
	Evaluation records	Activity planning and management	In session file in Office 4 / Evaluations stored in Office 1	Manager	1 year
Publicity and promotional material	Photographs and articles (with consent)	Publicity and decoration	In filing cabinet no 8 and on PC Network	Original documents – all staff Publicised articles – general public	Indefinitely
	Annual review and organisational plans (with consent)	Publicity, evaluation and planning, feedback to funders	Original documents on PC and hard copies on display and widely available	All staff and designated volunteers	Up to 6 years plus current year
Finance	Bank statements	Reference	Office 2 /Archive Cabinet	Manager and Business Support Manager	6 years + current year
	Audited Accounts	Reference	Office 2	Manager and Business Support Manager	Indefinitely
	Invoices	Reference	Office 2/Archive Cabinet	Manager and Business Support Manager	6 years + current year
	Petty Cash	Reference	Office 2/Archive	Manager and	6 years +



	Vouchers		Cabinet	Business Support Manager	current
	Cheque books/Pay in books	Reference	Office 2 /Archive Cabinet	Manager and Business Support Manager	6 years + current
	Employee Payroll Records	Reference	Office 2/Archive Cabinet	Manager and Business Support Manager	6 years + current
Funding Information	Funding applications	Reference	Office 2 and on PC network		20 years + current
<b>Area</b>	<b>What information?</b>	<b>What is it used for?</b>	<b>Where is it kept?</b>	<b>Who has access to it?</b>	<b>How long is it kept for?</b>
Fire Inspection Reports	Inspection reports	Monitoring and Reference	Office 2	Manager and Business Support Manager	6 years + current year
Insurance Policies	Insurance	Reference	Office 2 and on PC network	Manager and Business Support Manager	6 years + current year
Records of accidents and incidents and safeguarding	Accident records folder	Monitoring and Reference	Office 2 and on PC network	All staff and designated volunteers	Up to when the child is 25 years of age
	Child protection records	Monitoring and Reference	Office 1 and on PC network	Manager and Child protection advisor	Up to when the child is 30 years of age
	Incident records	Reference	Office 2 and on PC network	Manager and Business Support Manager	Up to when the child is 25 years of age
Records of complaints	Report of verbal complaint	Reference	Office 1	Manager	Up to 6 years after complaint
Board meeting records	Minutes	Reference	Office 2 and archive cupboard	Manager and Business Support Manager	Indefinitely
Staff meeting records	Minutes	Reference	On PC network	All staff and volunteers (previously said	6 years plus 1 year after the meeting

				Manager)	
Work or student placement information	Personal details	Personnel Management	Office 1	Manager	1 year after the individual has left
Archived documents	All working documents from previous years	Useful as a secondary back up	On the PC network in the Archive folder	All staff and volunteers	See above