|  |
| --- |
| **Audit of Information Which Contains Personal Information** Where references are made to archiving: our archived files are scanned, placed in a named folder on the computer. For ease of reading, the word ‘parent’ has been used within this document. It indicates the person who has parental responsibility for a child. The safety of children will always be paramount. The Children’s Act supersedes the GDPR where a child may be at risk. |
| Type of information: | Who the record is about? | Who can access the information? | Format? | How it is held/stored? | Retention Period | How is the information disposed of? | Which lawful basis?And in the cases of sensitive data, which Special Category Data? |
| Children’s registration forms | The child and their families | All practitioners if required during the nursery day. Lisa, Jess and Emily have the code to the locked office cupboard.  | Paper | Kept in a lockable cupboard in the office. | Scanned onto the computer, to which only the manager has access. If, however, there are outstanding bills, the parent’s name, address and phone number will be retained until the bill is cleared in full.Until the child turns 21 and 3 months.  | Paper shredder | Legal Obligation.Vital interestsProvision of medical treatment |
| Staff files | Staff. Also holds names and phone numbers of who they would like contacted in an emergency.  | Lisa, Jess and Emily have the code to the locked office cupboard. Lisa & Jess has access to the archives.  | Paper | Kept in a locked cupboard inside the office. Archived once the staff member has left and all employment details have been finalised.  | Scanned onto the computer, to which only the manager has access. 8 years after the staff member ceases employment.  | Paper shredder | ContractVital interestsProvision of medical treatmentEmployment and social protection  |
| Registers | Children and staff | Any practitioner during the week they are being used.Lisa, Jess and Emily have the code to the locked office cupboard. Lisa & Jess has access to the archives.  | Paper | Kept in the rooms for the weeks they are being used. 1-6 months of records are kept in the lockable office cupboard.Records older than 3-6 months are archived.  | Until the child turns 21 and 3 months.  | Paper shredder | Legal obligation  |
| SEND records | Children. Some references to their families, staff and any other professionals working with the child.  | Emily, Lisa, Jess, Sarah H and Mark have access to the computer.  | Computer | Stored electronically and password controlled. Paper information is scanned and then placed in the child’s file. Computers have virus protection. Once the child leaves the setting records are archived on the computer. | Until the child turns 21 and 3 months.  | Deleted from computer | Legal Obligation.Vital interestsProvision of medical treatment |
| Child protection records | Children and their families. Some references to staff, families and any other professionals working with the child. | Lisa, Jess, Emily are key holders to the filing cabinet, (Designated Safeguarding Lead trained). . | Paper | Kept in a locked cabinet inside the office. | Records are hand-delivered, or posted via registered mail, to the children’s next setting and written, signed confirmation of acceptance is obtained. This is kept until the child reaches 21 years and 3 months. If a child is home schooled when they leave Amberley, or we are unable to ascertain their next setting; their records will be stored in the child protection filling cabinet as per records of the children currently in attendance.  | Passed on to next setting. If records are unable to be passed on- until the child is 21 years and 3 months.  | Legal Obligation.Vital interestsProvision of medical treatmentLegal and court claims |
| Children’s learning journals  | Children. Some references to staff and any other professionals working with the child. | All staff working with the child.Parents can access their own child’s records upon request, but not those of any other child. Other professionals working with the child, where parents have given permission for information sharing.  | Paper  | Kept in the rooms.  | Date the child leaves Amberley.  | Records are passed on to parents when children leave Amberley.  | Legal Obligation Consent (photos of other children) *obtained on registration form*  |
| Children’s observations | Children. Sometimes more than one child will be included within an observation description or photograph.  | Staff working with the child. Parents are emailed them termly and can request to see them before this.  | Held electronically  | Access via tablet or office computer. Lisa, Emily, Jess hold the password to online access. A reputable company is used.  | Date the child leaves Amberley.  | Emailed to parents when child leaves Amberley. Deleted from website.  | Legal obligation (own child’s observations)Consent (group photos) *obtained on registration form* |
| Complaints records | Children, families, staff.  | Anyone can access anonymous details of the complaint via the complaints book. Records with personal details on are kept in either the staff file or safeguarding file (whichever is most appropriate)-see above. | Paper | In the hallway. In the locked cupboard in the office, which is locked when not in use.  | If relating to a child-when the child turns 21 years and 3 months. If relating to a staff member-8 years after they leave employment. If relates to both staff and children-21 years and 3 months.  | Paper shredder | Legal Obligation Possibly: Vital interestsProvision of medical treatmentEmployment and social protectionLegal and court claims (depending upon the nature of the complaint) |
| Safer Food Better Business  | Staff | All staff | Paper | In the kitchen  | 8 years after the staff member ceases employment at Amberley | Paper shredder | Legal obligation  |
| Training matrix | Staff | All staff | Paper | On display in the office | Reviewed each year. Not retained.  | Paper shredder | Legal obligation  |
| Visitors book | Anyone who comes into the building who is not staff, parent or a child.  | Anyone  | Paper | In the hallway, ready for use in an emergency evacuation.  | Until the book expires | Paper shredder | Legal obligation  |
| Staff photo and names in hallway  | Staff | Anyone visiting | Paper | On display in the hallway | Date the staff member leaves Amberley | Paper shredder or given to the individual staff member | Legal obligation  |
| Website | Staff photos, names and information about them.Children’s photographs | Anyone | Online/electronic | On website | Removed within 3 months of the staff member leaving employment (unless they withdraw consent sooner).Children’s photos ongoing, unless consent is withdrawn.  | Deleted from website | Consent *obtained as part of registration/ induction*  |
| Accident forms | Anyone who comes onto our premises | The individual the form relates to.The first aider. The parent (if applicable)Medical staff such as paramedics (if applicable)Other agencies, such as OFSTED (if applicable)Other staff, e.g. to provide feedback to parents, or when taking over care of a child from the first aider.  | paper | Forms are kept in a folder in the rooms until they are audited.After auditing the forms are electronically archived.  | 21 years, 3 months.  | Paper shredder | Legal obligation.  |
| Incident records | Children. May contain references to staff, families and any other professionals working with the child. | Parent, staff members working with the child, Designated Safeguarding Leads, other professionals.  | Paper  | Forms are kept in the locked safeguarding cabinet, key holders are Lisa, Jess and Emily. | These records form part of child protection, please refer to the above section.  | See above for child protection records.  | Legal Obligation  |
| Medicine records | Children. Some references to parents and staff.  | All staff working with the child.  | Paper | In a folder, in the medicine cabinet. Completed forms are removed at 3 monthly audits and archived on the computer.  | Until the child is 21 years and 3 months.  | Paper shredder | Legal obligation.Vital interestsProvision of medical treatment |
| Photos on displays | Children, staff, students, visitors. | Anyone visiting the setting | Paper | On display within the nursery grounds | Displays are updated regularly, at longest one year after a child leaves the setting. Sooner if consent is withdrawn.  | Given to the individual or paper shredder. | Consent *obtained at registration, staff/student induction or by visitor permission at the time of the event.*  |
| Social media | Children, staff, students, visitors, families. | AnyoneLisa, Jess, Emily and Mark have administrator access to our Facebook page. Mark has administrator access to Instagram. | Online | Online  | Forever. Only removed when consent is withdrawn.  | Photos are deleted if consent is withdrawn.  | Consent *Consent obtained at registration, staff/student induction or by visitor/family permission at the time of the event.*  |
| Media publications | Children, staff, students, visitors, families. | Anyone | Paper and online | In the public domain, this will depend upon the type of media publication.  | Forever.  | Amberley will be unlikely to control the disposal and storage of this information.  | Consent *Consent obtained at registration, staff/student induction or by visitor/family permission at the time of the event.* |
| Diary  | Anyone *(minimal details about a person, usually only their name and their telephone number if they choose to give it to us)* | Any staff member | paper | Kept in the office. | Up to 1 year after the diary has ended | Paper shredder | Legal consent |
| Holiday records  | Staff | Management | Paper | Kept in a file in the lockable office cupboard. At the end of the holiday year it is transferred to the staff members personal file.  | 8 years after the staff members employment ends.  | Paper shredder | Legal consent  |

Audit completed by: Lisa Gray

Date completed: September 2021

Review due: October 2022