



Confidentiality & Sharing Policy

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Our work with children and their families will bring us into contact with confidential information which will only be used to enhance the welfare of their children. As part of GDPR (**General Data Protection Regulation**), the new law that was introduced on the 25th May 2018, replaces the data protection act 1998. GDPR is the legislation that is designed to "harmonise" data privacy laws across Europe as well as give greater protection and rights to individuals. Parents have a right to know and be informed about the circumstances, and reasons, when we are obliged to share information. We will be open and honest and we will explain to families how, when and why the information will be shared about them and with whom. It is a legal requirement for the club to hold information about members, committee and volunteers working at the Club. Information should be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, relevant and secure).

All Committee and Volunteers must:

- have a common understanding of information sharing
- know the procedures to follow when sharing information
- understand the accompanying need for appropriate confidentiality when working with children, young people, their parents/carers and fellow professionals

Records

Records are kept for the purpose of maintaining club membership. These include health and safety records, financial records, contractual documentation, and records of committee and volunteers.

Personal records include membership forms and consent forms and any on-going record of relevant contact with parents or correspondence concerning the child or family from other agencies. These are stored in a lockable cabinet and are kept secure by the Club membership secretary. A digital copy is kept on a stored server that is password protected and file encrypted. The address to the server is only known by the committee and requires specific software to access it. Parents have access to the files and records of their own children but do not have access to information about any other child.

Recording information

The club should explain to the child/young person and, if appropriate, any adult with parental responsibility here is the information as follows:

- **the purpose for which the information is being recorded is;** The club keeps information on our skaters so we can ensure they are placed in the right category at skating competitions. The club needs contact details to keep you informed as a club member and have written permission / details regarding what we can and can't do as a club. The club needs your medical details in the event of any unforeseen circumstances and we need to act as loci-parentis or share with medical practitioners, important information regarding you. Emergency contact details are required so we always have a way of getting in touch with someone close to you in times of need, ideally next of kin. The club also keeps a range of other data which is described in our Privacy Documentation.
- **where and for how long the record will be kept**
The club keeps information on our skaters for a two-year period. One for the current year and one for the previous year in case there are any bits of unfinished correspondence. The club is trying to limit hard copies of data and just access electronically on the club's secure cloud drive. Any hard copies of skater details are kept in a folder and should be placed in a secure container with a lock to prevent access. We aim keep all electronic data safely secured in the cloud drive that is password protected and encrypted on a server that is also password protected. Any copies should be downloaded to a passworded device and the file its self should be password protected. Files should be deleted if not being used. Hard copies will be shredded and files deleted after two years. Any correspondence with the club is kept in the club's official email inboxes. This information is purged yearly, but if required is kept for the maximum two-year period. Any emails regarding legal, safeguarding or issues pertaining to welfare of skaters are justified and retained in case of any future ramifications. Any photos of competitions are kept on the clubs secure encrypted server and also on the password, encrypted platform Gotphoto, which we use to sell these images.
- **the circumstances in which it may be shared with other people.**
Information is shared in medical situations when the parent is not present and the club acts in Loci Parenti.
- **any other people and agencies who may have or may be given access to the information.**
Information on skaters during a time of concern may be shared with outside agencies such as BIS, the police, social services, but the club chairman will deem if this is a necessity when the situation arises. WISC will never share your data with any outside agency unless there is a matter relating to the safety, or harm may be about to occur to an individual.

- **Communication**

As a club we choose to use google mail as our preferred platform for sending and receiving official emails. We upload a data base of names and email addresses for the current skating year, of skaters that have given consent to be emailed. This is to allow us to contact all our members. All the club email accounts are secured with password protection and google identifies devices and IP addresses that have not been used before to sign in to that device. The Chairman monitors all email addresses and is alerted to any potential breach in which peoples' data can be accessed. The Chairman has the facility to lockdown all accounts and change passwords immediately as they are all linked.

- **third Party contractors**

The club does use 3rd party services in order to deliver information to our members. The club uses mail chimp for the monthly newsletters, Wix as its website provider and Gotphoto to publish and sell competition photos. No data is ever given to these companies for their marketing. The data we provide such as names and emails are to perform a club service e.g. emailing out a newsletter. Gotphoto also uses a similar data base so we can set up secure logins for parents to access just their children's photos from competition.

Wix does collect and monitor information in partnership with google analytics so we can keep track of how the website is being used to enhance this service, but no individual personal data is associated, just computer IP addresses which does not highlight the name of an individual. All of our data bases with third party providers are purged on a yearly basis.

Record Keeping

There are record keeping systems in place that meet legal requirements; means of storing and sharing that information take place within the framework of the Data Protection Act Now the GDPR and the Human Rights Act. Confidentiality will be kept at all times following this procedure:

- Confidential records are stored in a locked filing cabinet.
- Parents are informed when we need to record confidential information beyond the general personal information we keep i.e. injuries, concerns, safeguarding, contact with external agencies.
- Written consent is sought from parents before information is shared with external agencies, unless a child is considered at risk, when our safeguarding policy will be followed.
- Parents have access to files and records of their own children but not to those of any other child.
- All Committee members are aware that personal information given by parents is confidential and only for use within the Club.
- If parents share information about themselves with other parents, as well as the committee we cannot be held responsible if information is shared by those parents whom the person has 'confided' in.
- Committee and volunteer inductions include an awareness of the importance of confidentiality.
- If Committee breach this policy this may result in disciplinary action including dismissal.

- All records need to be relevant, brief, accurate and to the point. Facts should be recorded, and only formal professional opinions recorded which practitioners would be willing to share with the child/young person or their family.
- Recorded information should be retained or disposed of as per the Retention Policy.

Access to records

Parents may request access to any confidential records held on their child and family following the procedure below:

- All third parties are written to, asking for their permission to disclose to the person requesting it. This includes all family members and workers from other agencies, referred to in the records.
- When all the consents/refusals to disclose have been received, all information which a third party has refused consent to disclose is removed and the file photocopied.
- The photocopied file is given to the parents by the club secretary who will explain the contents of the file.

Information Sharing and Data Protection

- Information is recorded, stored and shared appropriately as per the Data Protection Act.
 - Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it may put them or someone else at risk or inappropriate to do so.
 - Seek advice if you are in any doubt, without disclosing the identity of the person where possible
 - Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. The decision to share or not to share information about a child/young person should always be based on professional judgement.
 - Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
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- Necessary, proportionate, relevant, accurate, timely and secure. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
 - The reasons for sharing or not sharing information must be recorded. If information is shared, the record must include which information was shared, when and with whom.

The circumstances in which information can be shared are explained to parents at registration and they sign a form to say that they understand the circumstances when information may be shared without their consent. We are obliged to share confidential information without authorisation from the person who provided it or to whom it relates, if it is in the public interest. This is when it is to prevent a crime from being committed or intervene where one may have happened or to prevent harm to a child or adult. The decision should be made by both the Club Welfare Officer and the Lead Safeguarding Officer.

Information will not be shared on request by the parent/carer:

- Where there is evidence that the child is suffering, or is at risk of suffering, significant harm
- Where there is reasonable cause to believe that a child may be suffering, or at risk of suffering, significant harm
- To prevent significant harm arising to children and young people or serious harm to adults, including the prevention, detection and prosecution of serious crime.