

## High needs information management

High medical needs in the setting i.e. feeding tubes, seizures etc.

Emergency details for SEN children held in a pack in headteachers office, ready should emergency services require this, should this room be locked?

Medical equipment protocol for SEN children is held on the wall of changing areas and bathrooms for the child's 1-1 to keep up-dated during the day. Staff and cleaners have access to these areas. Does this need to be reviewed as names are on these documents?

Response:

For safeguarding reasons, it may be necessary to have on display, as a reminder to staff, information about special needs, including medical needs, of children at a Setting.

However you must ensure that you have appropriate security measures in place to protect the personal data you hold. A key principle of the GDPR is that you must process personal data securely by means of 'appropriate technical and **organisational measures**'; this is the 'security principle'. Emergency details for SEN children and medical equipment protocols for SEN children should be held securely and should only be accessible to those who need to see it.

If it is not practicable to remove or obscure the information when staff and cleaners have access to these areas, then these staff and cleaners should be advised about confidentiality obligations and these obligations should be included in their contracts of employment/service contracts, and they should be trained on data protection rules.

## Third party product security information

The key is to have in place appropriate technical security measures to preserve the confidentiality and integrity of the data.

Staff have iPad's, they take them home to do children's journals on 'Tapestry' (online). They have password to use the IPad and another password and pin to access and work on the records. Parent share their childs journal, but they have their own pin and password. Is this OK?

Response:

For security information Harrow settings need to approach the provider of the IT solution for relevant information. The third party provider should outline policies around storing and securing information, password management policy and will likely have recommendations for managing information security for parents and providers accessing the product. Users should also consider wider aspects of securing information such as data storage and taking precautions against keystroke logging with installed anti spyware to secure units.

## Templates/privacy notices

Do we have any?

Response:

There are a number of areas where this can be obtained:

[Government Privacy Notices Education](#)

There are guides on what should be held in consent forms here

[ICO consent forms](#)

We have the [Transition privacy notice](#) which has been reviewed by HB Public Law

There are a number of Early Years support agencies who may have templates for review.

## Right to Access

Do we have to release CCTV footage if a parent requests it for their child?

Response:

Usually yes. CCTV images constitute personal data to which the parents have a right of access.

Please seek legal guidance. Some information can be found on the [ICO CCTV](#)

## Can files be stored on the computer or do all files that contain children information need to be encrypted?

Response:

Further information can be found here at [ICO Data Storage](#)

## Further information

[ICO Children Information](#)