# Station House Community Association Ltd

**Communications Policy**

# Statement of intent

Station House Community Association Ltd (SHCA) actively seeks to communicate fairly, honestly and ethically with all its stakeholders.

# Aim

We aim to ensure that all service users, employees and volunteers can share their information in the confidence that it will only be used to enhance SHCA

**Expected behaviours**

Every one is expected to:

Listen to other people’s views.

Be open and

honest about their own views.

Have respect for other people- verbal, sexual or physical harassment is not acceptable.

Be accountable for their actions.

Work in such a way that does not put a member of staff or others in danger.

Where problems do arise, they should be addressed as follows:-

* All the staff and volunteers in the activity meet to discuss what has happened and try to resolve it.
* If issues cannot be resolved informally, then a member of staff should be asked to mediate.
* Physical aggression of any sort is totally unacceptable.
* Adults and children are expected to communicate without fear of intimidation of bullying; any contravention of this will prompt an immediate request to leave the building.

**When dealing with behaviour issues**

We will encourage all children to help set their own codes for behaviour in session.

We require all staff, volunteers, and students to provide a positive model of behaviour by treating children, parents and one another with friendliness, care and courtesy.

We require all staff, volunteers and students to use positive strategies for handling any conflict by helping children find solutions in ways which are appropriate for the children’s ages and stages of development – for example;-

* Avoiding conflict.
* Explanation.
* Distraction.
* Encouraging, affirming, praise and reward.
* Providing alternatives
* In after school and holiday club we use behaviour reminder charts

We familiarise new staff and volunteers with the childcare services behaviour policy and its rules for behaviour.

* We praise and endorse desirable behaviour such as kindness and willingness to share.
* We avoid creating situations in which children receive adult attention only in return for undesirable behaviour.
* We recognise that codes for interacting with other people vary between cultures and require staff to be aware of – and respect – those used by members of the childcare projects.
* When children behave in unacceptable ways, we help them to see what was wrong and how to cope more appropriately.
* We never send children out of the room by themselves.
* We never use physical punishment such as smacking. Children are never threatened with these, we do not use the word ‘naughty’.
* We do not use techniques intended to single out and humiliate individual or groups.
* We only use physical restraint, such as holding, to prevent physical injury to children or adults and/or serious damage to property. Details of such an event are brought to the attention of the practitioner and are recorded in our cause for concern folder. The parent is informed on the same day. Low level poor behaviour is tracked in the behaviour management book
* In cases of serious misbehaviour such as racial or other abuse, we make clear immediately the unacceptability of the behaviour and attitudes, by means of explanations rather than personal blame.
* We do not shout or raise our voices in a threatening way.

The nominated person for behaviour management is Carole Jones, deputy Yvonne Friend Jones.

Bullying

Bullying involves emotional, physical and/or verbal abuse.

If a child bullies another child or children;

* We intervene to stop the child harming the other child or children
* We explain to the child doing the bullying why their behaviour is inappropriate
* We give reassurance to the child or children who have been bullied
* We help the child who has done the bullying to show remorse for their actions
* We make sure that children who bully receive praise when they display acceptable behaviour
* We do not label children who bully
* When children bully, we discuss what has happened with their parents and work out with them a plan for handling the child’s behaviour
* When children have been bullied, we share what has happened with their parents, explaining that the child who did the bullying is being helped to adopt more acceptable ways of behaving.

If bullying occurs between adults it should be reported to the childcare manager or chief executive who must deal with it immediately.

**Parents as Partners**

We treat parents with respect and dignity

We constantly seek different opportunities to involve parents

We appreciate that parents are the primary educators and influence, and we are a support service

We acknowledge parents expertise and work with them to utilise it

Where we think that external help is needed we work with parents to plan a considered approach

We recognise that a one size fits all approach is NOT suitable

We strive to use clear plain language and not hide behind technical language

We are keen to share good experiences and work proactively where there are problems

Where sensitive information is to be shared, parents and children are given privacy and dignity.

 On the child’s arrival and departure at the setting it is important to greet the parents and the child and exchange any information that either the parents or the staff has about the child’s day. Staff should, where possible, involve the Parents in any changes of routine that may have occurred regarding the Child.

**Confidentiality**

To ensure that all those using and working in SHCA can do so with confidence, we respect confidentiality in the following ways:

Parents have ready access to the files and records of their own children, but do not have access to information about any other child.

Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child’s needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.

Any concerns/evidence relating to the child’s personal safety are kept in a secure, confidential file and are shared with as few people as possible on a ‘need to know’ basis.

Personal information about children & families is kept in the staff area and access is controlled and staff records are kept securely in lockable files.

Issues to do with the employment of staff, whether paid or unpaid, remain confidential to the people directly involved with making personnel decisions.

Staff and volunteers are advised of our confidentiality policy and required to respect it.

No press release about SHCA or any of it projects should be released without prior consent of the Chief Executive or the management committee.

 **Data protection (updated to include General Data Protection Regulation GDPR)**

The data Controller is Station House Community Association Ltd (SHCA)
The data protection compliance officer is Charlotte Williams, deputy Carole Jones
The data processors are Trustees, staff and volunteers of SHCA
The data subjects are all our stakeholdres (Children, their relevant adults, staff volunteers, trustees, contractors, working partners etc)

Data is all manual, computerised and non-text data

Station House Community Association (SHCA) holds two types of information which are covered by this policy:

**personal** information – information about individuals such as names, addresses, job titles.

**sensitive** personal information – in general this kind of information is only held about employees.

There are, however, instances where sensitive information is held about other people. For example information about dietary requirements might allow a person’s religion to be deduced.

The 8 principles of data protection
It must be collected and used fairly and inside the law.
It must only be held and used for the reasons given to the Information Commissioner.
It can only be used for those registered purposes and only be disclosed to those people mentioned in the register entry. You cannot give it away or sell it unless you said you would to begin with.
The information held must be adequate, relevant and not excessive when compared with the purpose stated in the register. So you must have enough detail but not too much for the job that you are doing with the data.
It must be accurate and be kept up to date. There is a duty to keep it up to date, for example to change an address when people move.
It must not be kept longer than is necessary for the registered purpose. It is alright to keep information for certain lengths of time but not indefinitely. This rule means that it would be wrong to keep information about past customers longer than a few years at most.
The information must be kept safe and secure. This includes keeping the information backed up and away from any unauthorised access. It would be wrong to leave personal data open to be viewed by just anyone.
The files may not be transferred outside of the European Economic Area (that's the EU plus some small European countries) unless the country that the data is being sent to has a suitable data protection law.

(our GDPR retention document is in appendix 1)

Transportation of data
Before any data is transported consider
Is it necessary?, Is it safe and secure? Can it be anonymised? All transportation must be recorded in the records. All documents must be transported in a sealed container(envelope) with contact details for lost documents to be returned.

SHCA will not hold information about individuals without their knowledge and consent.

SHCA will only hold information for specific purposes. It will inform data subjects what those purposes are. It will also inform them if those purposes change.

Information will not be retained once it is no longer required for its stated purpose.

SHCA will seek to maintain accurate information by creating ways in which data subjects can update the information held.

Data subjects will be given the option not to receive marketing mailings from SHCA or other organisations.

Data subjects will be entitled to have access to information held about them by SHCA.

Information about data subjects will not be disclosed to other organisations or to individuals who are not members of SHCA staff or Trustee Board, except in circumstances where this is a legal requirement, where there is explicit or implied consent, or where the information is publicly available elsewhere.

SHCA has procedures for ensuring the security of all personal data. Paper records containing confidential personnel data are disposed of in a secure way by shredding.

All computers are password protected.

At the beginning of any new project or type of activity, the member of staff managing it will consult with the Chief Executive about any data protection implications.

There may be situations where SHCA works in partnership with other organisations on projects which require data sharing. SHCA will clarify which organisation is to be the Data Controller and will ensure that the Data Controller deals correctly with any data which SHCA has collected.

All new staff will be given training on the data protection policy and procedures.

SHCA will carry out an annual review of its data protection policy and procedures.

**Electronic communications**

For staff and volunteers

Mobile phones are stored in the agreed area during childcare sessions and must only be answered in staff only areas

Mobile phones should be switched on during school runs and visits, but only used for work calls in emergencies; Personal calls must wait until the children are in a safer environment.

Mobile phones should be stored safely as SHCA is not insured should they be stolen lost or damaged.

Staff must not post anything onto social networking sites such as ‘Facebook’ that could be construed to have any impact on the setting’s reputation.

Staff must not post anything onto social networking sites that would offend any other member of staff or parent using the setting.

If staff choose to allow parents to view their page on social networking sites, then this relationship must remain professional at all times.

Staff and volunteers should not accept children as “friends” unless there is a previous family relationship. Even then, caution must be taken.

Staff must not use cameras on personal phones etc to take photo’s of the children.

*If any of the above points are found to be occurring, then the member of staff involved will face disciplinary action, which could result in dismissal.*

Station House mobile phone is used as a camera and music system. Photos taken must be stored on the designated storage facility and never emailed. Its sole purpose is for the taking of photos and sharing them to the storage facility and to provide music from a pre selected library. Staff must not add their own music. The phone should not be used for any other purpose. *Anyone not following this procedure is in breach of their contract and can be subject to disciplinary procedures.*

Staff are advised the that new technology is constantly developing and devices such as Fitbits and Apple watches are portable data devices and therefore subject to our best practice.

For Children

Children are not allowed mobile phones, hand held electronic games and personal computers, fitbits and apple watches etc. If they do bring them, they must be stored in a safe area away from general use.

**Use of the internet**

# Methods

For adults

SHCA computer and internet use must be appropriate to staff members’ professional activity.

Copyright and intellectual property rights must be respected.

Users are responsible for e-mails they send and for contacts made.

E-mail should be written carefully and politely. As messages may be forwarded, e-mail is best regarded as public property.

Anonymous letters and chain letters must not be sent.

The use of public chat rooms is not permitted.

SHCA’s ICT systems may not be used for private purposes unless the manager has given express permission for that use.

Use for personal financial gain, gambling, political purposes or advertising is forbidden.

The security of the ICT system must not be compromised, whether owned by SHCA or by other organisations or individuals.

Irresponsible use may result in the loss of the internet access.

No software should be downloaded without the express permission of the Chief Executive.

Security settings must not be changed without the express permission of the Chief Executive.

SHCA may exercise its rights by electronic means to monitor the use of the computer systems, including the monitoring of web-sites, the interception of e-mails and the deletion of inappropriate materials in circumstances where it believes unauthorised use of SHCA’s computer system is or may be taking place, or the system is or may be being used for criminal purposes for storing text or imagery which is unauthorised or unlawful.

For Children

* Staff must monitor child access to sites at all times.
* Security settings are at the highest levels and must not be changed.
* Staff must immediately report any inappropriate behaviour.
* Inappropriate behaviour will lead to the loss of computer access.

 **Use of social media**

**Admin and Governance**

Station House Community Association is committed to safeguarding their service users and the privacy settings of any social media accounts reflect this. The ability for “fans” to add photos or videos has been disabled and the organisation has committed to not using any photographs of service users to promote the page. This has also been clearly specified on the page.

No members under that age of 18 may join.

Also specified on the page is the intended use of the group – i.e. general discussion rather than individual cases or situations. A governance structure has been discussed and will be implemented by the employee listed below.

Where members post offensive messages we have a strategy to manage this

Phase one - removal of comment which will be logged.

Phase two – removal of comment and ban poster.

Phase Three – report poster to facebook.

Only nominated member of staff may be an administrator for social media, namely Childcare manager, administrator, and chief executive.

Staff and volunteer are all required to set their social media status to the highest security level possible and regularly check this. Any suspicious activity should be immediately reported. Staff and volunteer are not allowed to use their own personal accounts to distribute Station House business expect where they are sharing posts that have been originated form Station House.
Staff and volunteers are expected to remain professional at all times and take into account how their personal lives are portrayed. Any inappropriate posts can be seen as bringing the organisation into disrepute.

**Displays**

# Aim

* To celebrate children’s achievements.
* To boost children’s self-confidence.
* To enable the children, staff and visitors to gain an instant insight into the diversity of the work going on in the EYFS. .
* To create a bright, rich and stimulating environment for children to be in
* To provoke children and adults to think
* To ask questions to provoke learning
* To provide information that children and adults need on a daily basis

**Method**

**Principle**

The environment plays a key role in supporting and extending children’s development and learning.

**Supporting every child:**

The environment supports every child’s learning through planned experiences and activities that are challenging but achievable.

**The learning environment:** A rich and stimulating environment supports children’s learning and development. It gives them the confidence to explore and learn in secure and safe yet challenging indoor and outdoor spaces.

**The wider context:** Working in partnership with other settings, professionals and groups in the community supports children’s development and progress towards the outcomes of *Every Child Matters:* being healthy, staying safe, enjoying and achieving, making a positive contribution and economic well-being

**Planning of Display**

The best displays are those that involve a range of people in the planning and production

Appendix 1

RECORD RETENTION IN STATION HOUSE COMMUNITY ASSOCIATION Disposal of Records

Once retention periods have elapsed records which have been identified as safe for disposal must be destroyed in such a way to protect the sensitivity and/or confidentiality of their contents. Whilst awaiting disposal these records should be handled in the same way as any live data and should be kept secure. Inappropriate disposal of information, such as leaving a box of records to be shredded accessible to anyone, could lead to a serious information breach and a fine from the ICO should the data fall into the wrong hands.

Designated people, usually the manager in settings, should be identified as taking responsibility for the safe disposal of records. It is the role of this person to:

dispose of records securely and safely. Do not assume that pressing the “delete” key

on a computer based system necessarily removes a record completely.

ensure that there are no photocopies, images, copies or representation of the contents of the records being disposed

keep a record of when and which records have been destroyed (known as a Disposal Schedule)

Records containing sensitive personal detail and that which could identify a person should be cross-shredded either on-site or by a reputable company and all data should be destroyed by secure means, e.g. shredding, pulping or burning.

CHILD PROTECTION

|  |  |  |
| --- | --- | --- |
| Basic description | Contains personalinformation | Retention period |
| A statement of the arrangements in place to safeguard children. | No | From the date the procedure was superseded + 7 yearsIf these records are likely to be required in achild protection investigation then they should be retained for closure of setting + 50 years |
| A statement of the procedures to be followed in the event of allegations against staff. | No | From the date the procedure was superseded + 7 yearsIf these records are likely to be required in achild protection investigation then they should be retained for closure of setting + 50 years. |
| Child Protection files | Yes | 25 years after the child’s date of birth |
| Allegation of a child protection nature against a member of staff, including where theallegation is unfounded. | Yes | Until the person’s normal retirement age, or 10 years from the date of the allegation if that is longer. |

Records to be kept – FINANCIAL RECORDS

|  |  |  |
| --- | --- | --- |
| Basic description | Contains personalinformation | Retention period |
| Annual Accounts | No | 6 years after the tax year to which they relate |
| Bank statements, Invoices and receipts, petty cash records | No | 6 years after the tax year to which they relate |
| PAYE records | Yes | 3 years after the tax year to which they relate |
| Government grants | Yes | 4 years from receipt of the grant or as directed by the awarding body |
| Other grants and monitoring  | Yes | In line with their requirements  |

Records to be kept - STAFF

|  |  |  |
| --- | --- | --- |
| Basic description | Contains personalinformation | Retention period |
| The name, address and telephone number of any person who will be looking after children on the premises. | Yes | Closure of setting + 50 years.{Theses could be required to show who wasemployed in a child protection investigation.} |
| The name, address and telephone number of the registered person and every other person living or employed on the premises. | Yes | Closure of setting + 50 years.{Theses could be required to show who wasemployed in a child protection investigation.} |
| Personnel files—records relating to employment history | Yes | Termination of employment + 7 years |
| Pre-employment vetting information | Yes | Remain on staff personnel files during employment.Termination of employment + 7 years OR6 months after date of checks for unsuitable candidates |
| Staff training plans | Yes | Current year + 2 years |
| Evidence of staff training (certificates, awards etc) | Yes | Last award + 7 years |
| Disciplinary proceedings (except Child Protection) |  |  |
| Oral warning | Yes | 6 months after date of warning |
| First written warning | Yes | 6 months after date of warning |
| Second written warning | Yes | 12 months after date of warning |
| Final warning | Yes | 18 months after date of warning |
| Supervision and annual appraisal | Yes | Year of undertaking + 4 years |

Records to be kept - HEALTH AND SAFETY

|  |  |  |
| --- | --- | --- |
| Basic description | Contains personalinformation | Retention period |
| A record of any medicine administered to any child on the premises, including the date and circumstances of its administration, who administered it and the record of parental consent. | Yes | From the date of birth of the child to whom the medicine was administered + 25 years |
| A statement of the procedure to be followed in the event of an accident. | No | From the date the procedure was superseded + 7 years |
| A record of accidents occurring on the premises and incident books relating to other incidents | Yes | From the date of birth of the child involved in the accident/incident + 25 yearsFor adult injuries retention should be 7 years from the date of the accident. |
| Risk Assessments | No | Date superseded + 4 years{If an accident occurred as a result of an identified risk then these should be kept for 25 years fromthe child involved date of birth} |
| Premises files (maintenance and improvements) | No | Current year + 7 years then review |
| COSHH | No | Current year + 9 years |
| Incident reports (not Child Protection related) | Yes | 20 years |
| A statement of the procedure to be followed in the event of a fire. | No | From the date the procedure was superseded + 7 years |
| Fire evacuation and maintenance log books | No | Current year + 5 years |
| Fire Risk Assessment | No | Date superseded + 4 years |
| A statement of the procedure to be followed in the event of a missing child. | No | From the date the procedure was superseded + 7 years |
| Visitors books | Yes | 2 years after last entry |
| Insurance policies | No | Minimum of 6 years, maximum of 40years. Seek advice from your insurance provider. |
| Claims made against insurance policies (damage to property) | Yes | Case concluded + 3 years |
| Claims made against insurance policies (personal injury) | Yes | Case concluded + 6 years |

Records to be kept – PROVIDER RECORDS

|  |  |  |
| --- | --- | --- |
| Basic description | Contains personalinformation | Retention period |
| The name, home address and date of birth of each child who is looked after on thepremises. | Yes | Closure of setting + 50 years.{Theses could be required to show whether or not a child attended the provision in a childprotection investigation.} |
| The name, home address, and telephone number of a parent of each child who is looked after on the premises. | Yes | If this information is recorded in the same place as the above then the same retention period will apply.If stored separately then it can be destroyed when the child leaves the setting. |
| A daily record of the names of childrenlooked after on the premises, their hours of attendance and the names of the persons who looked after them. | Yes | These should be kept for a reasonable periodfrom when the child leaves, for example 3 years. However, if these records are likely to be required in a child protection investigation then theyshould be retained for closure of setting + 50 years. |
| Children’s Learning Journeys, Portfolio’s and Written Observations | Yes | To be sent with the child when s/he leaves the setting. |
| A statement of the procedure to be followed where a parent has made a complaint about the service being provided by the registered person. | No | From the date the procedure was superseded + 7 years |
| A record of complaints made against the setting. | Yes | From the date of the complaint+ 7 years.Where the complaint relates to Child Protection Closure of setting + 50 years.{These could be required to show whether or not a child attended the provision in a childprotection investigation.} |

Template record disposal schedule

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| File reference | Basic description | On whose authority | Method of disposal | Date disposed |
| ExampleBank Statements | Statements for the tax year 2010/11 | Manager | Cross shredded | 20.6.17 |
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Sources

Information Commissioner Office [www.ico.org.uk](http://www.ico.org.uk/) HMRC [www.gov.uk](http://www.gov.uk/)