



LINKS CHILDCARE POLICIES & PROCEDURES

GDPR POLICY

PERSONAL DATA REGISTER

Last Review Date: June 2023

Policy No.47 A

Issued: 2018

Category of Data Subject: CHILD						
	Type of Data	Storage of Data	Who has access to data	Information Security- Technical and Organisational Controls	Retention Period/Timeline for Disposal	How is data disposed
1.	Child's Name, Address and Date of Birth	<p>This data is stored on the Child Registration Form (manual or electronic), Medicine Records and Accident/Incident Records.</p> <p>It is also input into the PIP system for funding purposes.</p> <p>It is inputted onto childcare software ECCE Soft.</p>	<p>Internally Staff and Management</p> <p>Externally Software Supplier Regulator Tusla Funders and Funding Agencies: DCYA, Pobal and Childcare Committee Professional advisors (e.g. Legal)</p>	<p>Registration Forms are held under lock and key</p> <p>Other records are only accessible to staff in the rooms who are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed</p>	<p>2 years for TUSLA (from time the child ceases in the Service)</p> <p>Information may be required to be held longer than 2 years (e.g. where there has been an accident that required medical intervention or where a child was injured)</p>	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destructed</p>

				by suppliers to confirm that they are GDPR compliant.		
2.	Child's Medical History (conditions and allergies)	<p>This data is stored on the Child Registration Form (manual or electronic), Medicine Records, Care Plans Therapists/Advisors/ Mentor's reports</p> <p>It may also input into the PIP system for funding purposes.</p>	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Funders and Funding Agencies: DCYA, AIM, Pobal and Childcare Committee Professional advisors (e.g. Legal)</p> <p>Other professional such as psychologists and other therapists</p>	<p>Registration Forms are held under lock and key</p> <p>Other records are only accessible to staff in the rooms who are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required.</p>	2 years for TUSLA (from time the child ceases in the Service)	<p>Shredded internally or externally</p> <p>Electronic data destroyed</p>

3.	Information on child's additional needs (if relevant)	<p>This data is stored on the Child Registration Form (manual or electronic), Medicine Records, Care Plans Therapists/Advisors/ Mentor's reports</p> <p>It may also input into the PIP system for funding purposes.</p>	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Funders and Funding Agencies: DCYA, AIM, Pobal and Childcare Committee Professional advisors (e.g. Legal)</p> <p>Other professional such as psychologists and other therapists</p>	<p>Registration Forms are held under lock and key</p> <p>Other records are only accessible to staff in the rooms who are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required.</p>	2 years for TUSLA (from time the child ceases in the Service)	
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4.	Child's Vaccination Record	Child Registration Form Electronic Record Email	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Other professionals such as medical personnel</p>	<p>Registration Forms are held under lock and key</p> <p>Other records are only accessible to staff in the rooms who are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>	2 years for TUSLA (from time the child ceases in the Service)	Shredded internally or externally Or Electronic data destroyed
5.	Child Protection Reports (if relevant)	Child's file Electronic Record Email	<p><u>Internally</u> Management (on a "need to know" basis)</p> <p><u>Externally</u></p>	<p>Reports kept under lock and key</p> <p>Electronic data is held on a secure server</p>	2 years for TUSLA from the date the child ceases Links Childcare or as advised by Insurance	Shredded internally or externally Or

			<p>Regulator Tusla Professional advisors (e.g. Legal or HR including HR investigators) Gardaí Other professionals as relevant</p>	<p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>	<p>or Other Professionals if case pending.</p>	<p>Electronic data destroyed</p>
6.	Medicines used by child	Medicine Record Care Plans Medicine labels Apps	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Professional advisors (e.g. Legal) Other professionals such as medical personnel</p>	<p>Medicine forms kept discreetly in rooms and only accessible to staff</p> <p>Staff are vigilant that the records are not accessible or on display , except where parents/guardians give permission to display photo of child with serious allergies</p> <p>Electronic data is held on a secure server</p>	<p>2 years for TUSLA (from time the child ceases in the Service)</p>	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

				<p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>		
7.	Accident and Incidents	Accidents & Incident Book /Form Software Apps	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Professional advisors (e.g. Legal) External Investigators HAS Insurance Company Other professionals such as medical personnel</p>	<p>Accident forms kept discreetly in rooms and only accessible to staff and parents (copy)</p> <p>Staff are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p>	2 years for TUSLA (recommended up to the age of 21 for insurance purposes)	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destructed</p>

				<p>Privacy Statement in place Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>		
8.	Medical Emergencies	Report on Medical Emergency Medical Emergency Plan Apps	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Regulator Tusla Professional advisors (e.g. Legal) External Investigators HAS Insurance Company Other professionals such as medical personnel</p>	<p>Emergency Plans kept discreetly in rooms and only accessible to staff</p> <p>Staff are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed</p>	2 years for TUSLA (recommended up to the age of 21 for insurance purposes)	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destructed</p>

				<p>by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>		
9.	Photographs (individual and with other children)	<p>Learning Journals</p> <p>Wall Displays</p> <p>Newsletters</p> <p>Social Media</p> <p>Website</p>	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Parents and visitors Regulator Tusla DES Professional advisors (e.g. Legal) Other parents</p>	<p>Permissions are sought for the taking of photographs and for sharing photos (website, Facebook, newsletters etc)</p> <p>Permission is sought from all parents in respect of group photographs</p> <p>A policy is in place for Internet, Photographic and Recording Devices</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p>	<p>Displays and portfolios of photos will be kept for 2 years.</p> <p>Learning Journals will be sent home twice yearly with children and copies will not be kept</p> <p>Images on the website or Social Media will be kept for 2 years</p>	<p>Images will be deleted immediately from phones and saved on a more secure device</p> <p>Images will be deleted from websites and Social and electronic devices after 2 years unless further permission is granted</p>

				Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant (e.g. if a supplier is used to develop photographs)		
10.	Video	Website Social Media	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Software Supplier Parents and visitors Regulator Tusla DES Professional advisors (e.g. Legal) Other parents</p>	<p>Permission is sought for the taking of video and for sharing photos (website, Social Media, etc.)</p> <p>Permission is sought from all parents in respect of group videos and parents can opt out</p> <p>A policy is in place for Internet, Photographic and Recording Devices</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p>	Recordings are kept for 1 month	<p>Images will be deleted immediately from phones and saved on a more secure device</p> <p>Images will be deleted from websites and Social and electronic devices after 2 years unless further permission is granted</p>
11.	CCTV images (if applicable)	CCTV storage tapes	<p><u>Internally</u> Staff and Management</p>	<p>CCTV Policy in place</p> <p>Signage in place</p>	48 hours (unless under investigation or	Automatically erased.

			<p><u>Externally</u> CCTV supplier Technical expert if images must be redacted Data subject when there is a SAR Regulator Tusla Gardaí Insurance Company HSA Professional advisors (e.g. Legal)</p>	<p>CCTV not used for daily monitoring</p>	<p>related to an ongoing issue)</p>	
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12.	Care Orders/Custody Information	Child File Email	<p><u>Internally</u> Staff and Management on a need to know basis only</p> <p><u>Externally</u> Regulator Tusla Gardaí Insurance Company Professional advisors (e.g. Legal) Legal Advisors Other professional advisors</p>	<p>Information is held under lock and key</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm they are GDPR compliant</p> <p>Confidentiality Agreements signed by external professionals, if required</p>	2 years for TUSLA (from time the child ceases in the Service)	Shredded internally or externally Or Electronic data destructed
13.	Child's PPS number on welfare letter	PIP Portal	<p><u>Internally</u> PIP administrators at Links Childcare Head Office</p> <p><u>Externally</u> Pobal (PIP)</p>	<p>PPS numbers are held under lock and key until submitted</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place</p>	Only for the length of time it takes to submit child on to the PIP system and generate a DCYA number	n/a

14.	Child's Birth Cert	Child's file	Management only Administrator of PIP	Birth Certificates are held on the Child's File. These are held in locked secure unit.	Birth Certificates are only held until such time as the funding application for the child is approved.	Shredded or returned to parent/guardian
15.	Developmental Observation Records e.g. Focused Monitoring Form (FMF) or Individual Care Plan (ICP)	Child File in paper form Software app	<u>Internally</u> Staff and Management <u>Externally</u> Regulator Tusla Professionals such as therapists with permission Professional advisors Mentors Software supplier Primary School with permission	Developmental Observations are held under lock and key under the child's private file Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant Confidentiality Agreements	Kept only until the child leaves Links Childcare	Shredded internally or externally Or Electronic data destructed
16.	Learning Assessments /Observation	Scrapbooks Learning Journals	<u>Internally</u> Staff and Management <u>Externally</u> Regulator Tusla	Held in the care room discreetly Electronic data is held on a secure server	Send home with family when child finishes	n/a

Category of Data Subject: PARENTS/GUARDIANS, Authorised Collectors, Emergency Contacts

17.	Parent/Guardians Names, Addresses, Contact Details, place of work	Child Registration Form In Roll Book (Attendance Book) or separate Record in Care Rooms or brought on outings Childcare and accounting software.	<p><u>Internally</u> Staff and Management</p> <p><u>Externally</u> Regulator Tusla Professional Advisors Childcare and Accounting software</p>	<p>Registration Forms are held under lock and key</p> <p>Other records are only accessible to staff in the rooms who are vigilant that the records are not accessible or on display</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>	2 years for TUSLA (from time the child ceases in the Service)	Shredded internally or externally Or Electronic data destroyed
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18.	Parent Date of Birth Parent PPS number, Letter from social welfare stating type of welfare payments. Letter stating employment details if on employment scheme	These documents are scanned and stored on PIP system	<u>Internally</u> Staff and Management <u>Externally</u> DCYA Pobal Professional Advisors	Information held under lock and key until submitted Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected	Submission timeframe for funding scheme only	Shredded internally or externally Or Electronic data destroyed
19.	Parent/guardian bank account details	The data from the mandates is inputted into the accounting software package to enable processing.	<u>Internally</u> Accounts Department Staff <u>Externally</u> Banking institutions Accounting software package	Electronic data is held on a secure server Information held under lock and key until submitted		n/a
Category of Data Subject: STAFF						
19.	CV and/or application form	Staff file (manual or electronic)	<u>Internally</u> Management and HR Department <u>Externally</u> HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company	Staff files are held under lock and key Staff telephone numbers are not on display or accessible Electronic data is held on a secure server Electronic information is encrypted, and	1 year for candidates not selected. 6 years after staff member leaves employment.	Shredded internally or externally Or Electronic data destroyed

			Regulatory authorities such as Revenue, WRC or HSA Inspectors Online job application websites	PCs/Laptops are password protected Privacy Statement in place		
20.	Address and Contact details	Staff file (manual or electronic)	<u>Internally</u> Management or persons designated by management <u>Externally</u> HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such as Revenue, WRC or HSA Inspectors	Staff files are held under lock and key Staff telephone numbers are not on display or accessible Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place	6 years after a staff member leaves employment.	Shredded internally or externally Or Electronic data destroyed
21.	Copies of Qualifications and Training Certificates	Staff file (manual or electronic)	<u>Internally</u> Management or persons designated by management <u>Externally</u> HR Advisors Software Company Tusla	Staff files are held under lock and key Staff telephone numbers are not on display or accessible Electronic data is held on a secure server	6 years after a staff member leaves employment.	Shredded internally or externally Or Electronic data destroyed

			Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such as Revenue, WRC or HSA Inspectors	Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place		
22.	Validated references	Staff file (manual or electronic)	<u>Internally</u> Management or persons designated by management <u>Externally</u> HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such as Revenue, WRC or HSA Inspectors	Staff files are held under lock and key Staff telephone numbers are not on display or accessible Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place	5 years from commencement of employment. 1 year after staff leave.	Shredded internally or externally Or Electronic data destroyed
23.	Pay Slips/PPS number	Staff file (manual or electronic)	<u>Internally</u> Management or persons designated by management	Staff files are held under lock and key	1 year after staff member leaves employment.	Shredded internally or externally Or

			<p>Externally HR Advisors Payroll Software Company Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such as Revenue, WRC Inspectors Accounts/Payroll</p>	<p>Staff telephone numbers are not on display or accessible</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p>		<p>Electronic data destroyed</p>
24.	Garda Vetting	Staff file (manual or electronic)	<p>Internally Management or persons designated by management</p> <p>Externally HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities</p>	<p>Staff files are held under lock and key</p> <p>Staff telephone numbers are not on display or accessible</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p>	5 years from commencement of employment.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

				Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant		
25.	Next of Kin	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u> HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities</p>	<p>Staff files are held under lock and key</p> <p>Staff telephone numbers are not on display or accessible</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>	6 years after a staff member leaves employment.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>
26.	Meetings and Internal Training Documents	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u></p>	<p>Staff files are held under lock and key</p> <p>Staff telephone numbers are not on display or accessible</p>	6 years after a staff member leaves employment.	<p>Shredded internally or externally</p> <p>Or</p>

			<p>HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities Inspectors</p>	<p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>		Electronic data destroyed
27.	Medical History (including vaccinations)	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u> HR Advisors Software Company Legal/HR and other Professional Advisors Insurance Company</p>	<p>Consent given</p> <p>Staff files are held under lock and key</p> <p>Staff telephone numbers are not on display or accessible</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p>	6 years after a staff member leaves employment.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

				<p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>		
28.	Medical Reports	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u> HR Advisors Software Company Tusla Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such</p>	<p>Consent given Staff files are held under lock and key</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p>	6 years after a staff member leaves employment.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>
29.	Medical Certificates	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u> HR Advisors Software Company Legal/HR and other Professional Advisors Insurance Company</p>	<p>Staff files are held under lock and key</p> <p>Electronic data is held on a secure server,</p> <p>Electronic information is encrypted, and PCs or Laptops are password protected</p>	6 years after staff member leaves employment.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

30.	HR documents (disciplines, grievances etc.)	Staff file (manual or electronic)	<p><u>Internally</u> Management or persons designated by management</p> <p><u>Externally</u> HR Advisors Software Company Legal/HR and other Professional Advisors Insurance Company Regulatory authorities such as Revenue, WRC or HSA Inspectors</p>	<p>Staff files are held under lock and key</p> <p>Electronic data is held on a secure server Electronic information is encrypted and</p> <p>PCs/Laptops are password protected Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>	6 years after a staff member leaves employment. As advised by Insurance /Legal if required.	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>
OTHERS						
31.	CVs for trainers / Associates / Students / Volunteers	Paper and/or Electronic file	Management Tusla	<p>Information held under lock and key until submitted</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place</p>	1 year following termination of any agreement	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

				Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant		
32.	Garda Vetting for trainers / Associates / suppliers / Students / Volunteers	Paper and/or Electronic file	Management Tusla	Information held under lock and key until submitted Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant	5 years following commencement of engagement. 1 year following termination of any engagement	Shredded internally or externally Or Electronic data destroyed
33.	References for trainers / Associates / suppliers / Students / Volunteers where applicable	Paper and/or Electronic file	Management Tusla	Information held under lock and key until submitted Electronic data is held on a secure server Electronic information is encrypted, and PCs/Laptops are password protected	5 years following commencement of engagement. 1 year following termination of any engagement	Shredded internally or externally Or Electronic data destroyed

				<p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p>		
34.	CVs for job applicants (not staff)	Paper and/or Electronic file	Management	<p>Information held under lock and key until submitted</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected Privacy Statement in place</p>	<p>Timeframe of panel if part of recruitment.</p> <p>1 year recommended if no panel timeframe specified</p>	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>
35.	Contact details for child's emergency contacts	Child Registration Form Software Apps (Little Vista, Child Diary, Eccesoft)	Management Key Workers in Rooms Software Company Tusla	<p>Information held under lock and key until submitted</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p>	<p>2 years for TUSLA (from time the child ceases in the Service)</p>	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destroyed</p>

36.	Contact details for child's authorised collectors	Child Registration Form Software Apps (Little Vista, Child Diary, Ecopoet)	Management Key Workers in rooms Software Company Tusla	<p>Information held under lock and key until submitted</p> <p>Electronic data is held on a secure server</p> <p>Electronic information is encrypted, and PCs/Laptops are password protected</p> <p>Privacy Statement in place</p> <p>Due diligence questionnaire completed by suppliers to confirm that they are GDPR compliant</p> <p>Parents have confirmed to emergency contacts that they have provided the service with their details and this is signed off on enrolment form</p>	2 years for TUSLA (from time the child ceases in the Service)	<p>Shredded internally or externally</p> <p>Or</p> <p>Electronic data destructed</p>

Review Dates	June 2023		
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