



Brookside Pre-school Privacy Notice

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1.1 Children and their Families

Brookside Preschool record, process and retain personal information about children and their Parents/ Carers' in accordance with Article 6 of the General Data Protection Regulation (GDPR, May 2018); 'the rights of the data subjects'.

Brookside Preschool is registered with the Information Commissioners Office (ICO) Our registration and information on the records that we hold and why can be viewed on the Data Protection Public Register by following the link below:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Our registration number is: **ZA17337**

As a requirement of our registration we have a duty to provide Parents/Carers' with information about the details that we keep about them and their children. This requirement applies to information that we collect in relation to paper data processing and online data processing.

There are two types of records that we hold about children and their families;

Personal records including;

- Personal details required by the Statutory Frameworks and/ or the Local Authority.
- Emergency details including Emergency contact details, GP contact details and records of children's health/medical needs.
- Any relevant information on lifestyle, personal or social circumstances.
- Contract details such as attendance records, fees information and financial details.
- Safeguarding and child protection details.
- Records which are required in order to support children including shared information from other professionals. For Example, documents relating to Special Educational Needs and Disability (SEND).
- Records of accidents or incidents within the setting or at home.

Developmental records including;

- Information from Parents
- Observations of children's learning, assessments, progress summaries and individual planning.
- Photographs and videos of children's learning.
- Information on children's learning and development at home, including the 'what to expect when' document completed by Parents.
- Statutory 2-year Progress check.

We process sensitive classes of information that may include:

- Physical or mental health details
- Records of involvement with Social Services
- Racial or ethnic origin
- Religious or other beliefs

Brookside Pre-school holds information about children and their families to allow us to comply with the following Statutory Frameworks/ Government Guidance, please follow the links below for further information:

Early Years Foundation stage (EYFS, 2017)

https://www.foundationyears.org.uk/files/2017/03/EYFS_STATUTORY_FRAMEWORK_2017.pdf

Early Years and Childcare Registration Handbook (2016)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/650103/EY_and_childcare_reg_handbook.pdf

Early Years Inspection handbook (2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/596329/Early_years_inspection_handbook.pdf

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Information is treated confidentially and only relevant information is shared when there is a need to do so. Ideally Parental permission will be obtained in advance of sharing. For example;

- We are required to share a copy of children's 2-year progress check with their Health Visitor.
- We share information with other settings or agencies involved with the child's care.

I am required to share this information in compliance with the EYFS (2017).

- We share information on request for HMRC and Tax Credits regarding income and expenses such as invoices and payments.
- We share information with the Local Authority for the purposes of the 2,3 and 4-year-old funding and any additional funding we might claim for your child for example Early Years Pupil Premium (EYPP). Please see the Local Authority Privacy Notice for more details <https://www.stockport.gov.uk/privacy-notice>

What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- family, associates and representatives of the person whose personal data we are processing
- healthcare, social and welfare advisers or practitioners
- business associates
- financial organisations and professional advisers
- credit reference agencies, debt collection and tracing agencies
- education, educators and examining bodies
- schools
- local and central government
- persons making an enquiry or complaint
- suppliers
- service providers

Transfers

- It may sometimes be necessary to transfer personal information overseas. When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the Data Protection Act.

1.2 Ensuring that data is accurate

Under the GDPR Brookside Pre-school are required to ensure that all information about children and their families is accurate and up-to-date. We regularly check that information is correct and we prompt parents to check over their information and update any changes during Parent's/Carers' evenings. Parents'/Carers' have the right to access information about themselves and their children, information will be shared upon request.

1.3 Data Retention

We have an obligation to inform our service users and staff about what information we hold about them, how long it is retained for and why. Please see our 'Data Retention Policy' for further information.

1.4 Deleting of data

Online Data is cleared from our computer systems once children leave our setting. Tapestry has its own Data Retention Policy, Please, see our 'Tapestry Policy' for more information.

Paper Documents including photographs are handed to the Parents'/Carers as the child leaves the setting or moves on to School. Any remaining documents which we are not required to retain will be shredded. Please see our 'Data Retention Policy' for further information.

1.5 Data Breach

If a personal data breach occurred, we would need to establish the likelihood and severity of the resulting risk to people's rights and freedoms. This means that in the event that the data breach was not dealt with in a timely manner, people could lose control of their personal data and rights. This could potentially result in financial loss, identity theft or fraud, loss of confidentiality regarding information which would normally only be accessible to relevant professionals, discrimination and any other information which could cause significant economic or social disadvantage.

Brookside Pre-school take many measures to avoid potential security breaches. A breakdown of these control measures can be read in detail within sections 1.6 and 1.7 below. Any suspected notifiable breach of data would be reported to the ICO without undue delay, (no later than 72 hours after becoming aware of it).

1.6 Online Data Processing

Electronic Equipment

Brookside owns two Laptops which are used for Business purposes only. The computers are used only by the Management team and are password protected. Confidential documents and emails are protected further with additional programmes. Information is synced between the two laptops using Dropbox. For more information please visit www.dropbox.com

We own five Kindle Fires and one Apple iPad which we use to take photographs and videos for observation and assessment purposes. These devices are password protected and photographs are erased as soon as they are put onto the child's online learning journey (Tapestry). The devices do not leave the setting other than when the children go on walks outdoors where they are kept secured in a back pack.

Emails

We use Windows Mail to process our emails and our email provider is Microsoft Outlook. For more information on Microsoft Privacy statement please visit <https://privacy.microsoft.com/en-gb/privacystatement>

We obtain permission from parents to add them to our mail list and do not share email addresses with any other agencies for advertising purposes. Group emails are no longer to share information with Parents/ Carers 'used in order to ensure that contact details are not shared between parents.

Private emails are password protected and are erased once they are no longer needed. Please see our Data Retention section for further details.

We do not use email information for gathering statistics or any other purpose.

Website

Brookside Pre-school has its own website; www.brooksidepreschool.co.uk The website is processed by – PencilBlue which may collect anonymous information about your activity on the site. We do not use this information. There are some links for further information within our website, we cannot be held responsible for the accuracy of the information contained in those websites.

Personal information is not included on our website however we do add occasional photographs of children during their play. We seek prior permission specifically for our website from parents during the registration process (this can be viewed on the Permissions section of our child registration form).

Facebook Page

Brookside Pre-school has a public Facebook page for promotional purposes. The page does not include any personal information regarding children, families and staff. Photographs of children are avoided and are carefully chosen to ensure that the child's face is not visible. (Parent/ Carers permission is obtained prior to adding any photos to Facebook) Parents have the right to ask for photographs to be removed at any time.

Brookside Pre-school has a closed group for parent's access only. This is for the purpose of sharing information and news about the Pre-school. Parents can request to join this page via Facebook after answering some security questions and Management approval. Parents are not obliged to join this page and can leave the group at any time. Parents will be automatically removed by management if the child no longer attends Pre-school. No personal information regarding children, families or the staff is shared on this page and all comments have to be approved by management before being posted on the page.

Telephone

We use a mobile phone with the network provider – EE. Parents/Carers and child's first names and contact numbers are stored in the phone in case of an emergency. The phone stays within the setting and is taken out on all outings/trips and is password protected. Text messages to and from Parents/Carers are erased from our mobile phone after use.

Instant Nursery Manager (INM)

We use computer programme called (INM) to hold child information taken from our registration forms. We use this data system as it is specifically designed for nurseries to create childcare bills, registers, child information charts and other useful features. The programme is heavily protected by a number of passwords and is only accessible to the management team and our administrator.

I have requested information on GDPR from Instant Nursery Manager and the following information was given:

We are currently registered with the Data Protection Act, registered ZA192319, GDPR is replacing this in May.

It seems everyday there are cyber attacks on everything from large corporate companies to individuals email accounts, the above, GDPR, is coming into effect in May to replace the Data Protection Act, below are some reassurances we make and also something you can do to also help prevent attacks.

We secure the server as well as the connections as best we can, locking down users to access only their own folders, SSL secure connection is forced, Anti Malware/Viral protection running 24 hours a day.

You may need to know that all of our server are hosted in the UK and are certified ISO9001 and ISO27001.

There may be occasions where you will need us for remote support assistance, we can only carry out remote support if you have first contacted us either via our help phoneline or by email. You should instruct and ensure that any of your staff requesting remote support have first contacted us

through our help phone or email and not to accept support from any other cold caller.

The only time we would possibly have access to your data is if we upgraded the software on request, this would need explicit permission from your setting as we cannot access the data ourselves.

If a criminal viral attack occurred on our servers it is hard to see how the attacker could actually steal and access any data but precautions both by us and yourselves as detailed above should prevent this happening.

1.7 Paper Data Processing

Paper documentation about children and their families is stored within locked filling cabinets or achieved within a locked store cupboard. As we are a pack away setting our desk area is cleared each day and any paperwork including registers are all cleared away into locked areas. This information is available to Parents'/Carers on request.

Paper Data includes-

- Child's personal file including- Child Registration and permission forms, 'all about me' document, 'What to expect when' document, 2-year progress check and progress reviews, records of medical needs or medication, information on Special Educational Needs and Disability, shared information from other professionals, logs of additional support and Accident records.
- Attendance registers
- Records of plans and assessment to support children's learning
- Any 'Records of concern' relating to Safeguarding
- Records of complaints

Please see our 'Data Retention Policy' for more information.

Local Authority Parent Provider agreement

Parents claiming the 15 or 30-hour Government Funding for childcare are required to complete a Parent Provider agreement which asks for identifiers such as Parents names and National Insurance numbers, children's personal details and characteristics such as their ethnicity. This form is passed on to our administrator who uses the information to check eligibility and apply for the funding through the Early years Provider portal. Parent Provider agreements are kept in a secure locked filling cabinet. Please see our 'Data Retention Policy' for more information.

1.8 Displays

Parental permission is requested in our 'permissions' section of our child registration forms. This covers use of children's first name and photograph being used within the pre-school for displays of children's learning. Children's photographs and names are used to support both children and practitioners in a practical sense for example identifying coat pegs and Key Person boards.

In some cases, it is necessary for us to have lists visible for staff to remind them of children's medical/ care needs or allergies/dietary requirements. These pieces of information are put up in the environment sensitively and only display the child's first name with a very brief description of their need. This is information that we feel is necessary to have available to practitioners to ensure that we can promote the welfare of all children.

Information is shredded once children no longer attend the setting. Please see our 'Data Retention Policy' for more information.

1.9 Making a Complaint

What should I do if I believe that there has been a data breach, or I feel that my data has not been processed appropriately?

As with all complaints we would always encourage firstly that you raise your concerns with the Pre-school Manager. If you would like to report your concerns to the Information Commissioners Office (ICO) or Ofsted the details are as follows:

Information Commissioners Office (ICO) - <https://ico.org.uk/for-organisations/report-a-breach/>

Ofsted – email: enquiries@ofsted.gov.uk Contact tel: 03001231231 Address: Piccadilly Gate, Store Street, Manchester, M1 2WD

References and further information

Corner-1 (2018) Article about GDPR and the Early Years <https://app.croneri.co.uk/feature-articles/what-general-data-protection-regulation-means-early-years-providers>

ICO Website- <https://ico.org.uk/>

Neville, S. (2018) GDPR-Privacy Notice to Parents www.childcare.co.uk