



Leading Strings Pre-school

Data Protection Policy

Legislation:

General Data Protection Regulations (GDPR) 2018

Leading Strings Pre-school must comply and adhere to the GDPR (General Data Protection Regulations 2018).

Who it concerns:

Members of Leading Strings Preschool: parents/carers/staff/children may withdraw consent to hold information/data at any time - this can be requested through the Data Protection Officer (Kirsty Evensen).

Policy Intent

To ensure a clear and transparent way of managing individual's data and to be fully compliant with updated regulations.

GDPR Principles:

1. *You must have a lawful reason for collecting personal data and must do it in a fair and transparent way.*
2. *You must only use the data for the reason it is initially obtained.*
3. *You must not collect any more data than is necessary.*
4. *It has to be accurate and there must be mechanisms in place to keep it up to date.*
5. *You cannot keep it any longer than needed.*
6. *You must protect the personal data.*

What is Personal Data?

Personal Data is defined as information relating to an individual, whether it relates to his or her private, professional or public life. It can be a name, photograph, postal address, email address, bank details, medical information, identification number, location data or online identifier.

The GDPR applies to the collection and processing of personal data on manual filing systems, electronic devices and systems, and posts on social media.

All paper work is securely stored and held for the required amounts of time. Please see attached Retention guidance.

How personal data is deleted/destroyed

Who will make the decisions about deletion? - The setting manager

- Personal information 'paperwork' will be shredded and destroyed appropriately.
- All ICT personal data will be permanently deleted from all systems as required.
- Personal data shared electronically and in a commonly used format will be password protected.

Leading Strings Pre-school will not charge for complying with a request for copies of any personal data and will comply within 14 days of request. Leading Strings Pre-school will charge for requests that are manifestly unfounded or excessive. If a request is refused, Leading Strings Pre-school must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. This must be done without undue delay and at the latest, within one month.

Information held.

At Leading Strings Pre-school, parents and carers personal information and data including contacts, emails, photos, DOB, SEN information and statistics, health information and personal data. This information is shared only with parents' permission or in line with setting policy, and then only with third parties relevant to the families we work with, for example;

- Health visitors, • Doctors • EYFS and SEND agencies • LA • Schools • Children centres.

Accountability Principle:

If inaccurate information is shared with another organisations Leading Strings Pre-school must correct its own records and information and inform the other organisation that the information provided was inaccurate.

Consent:

Consent is sought from parents on their setting registration forms and via our setting privacy notice.

Parents have the right to update information and data as required and at any time.

What the pre-school will do to be transparent with the data will collect and store:

We ask people to positively opt in.

We use clear, plain language that is easy to understand.

We specify why we want the data and what we're going to do with it.

We have named our organisation and any third parties.

We tell individuals they can withdraw their consent.

We record consent. We keep a record of when and how we got consent from the individual.

We regularly review consents to check that the relationship, the processing and the purposes have not changed.

We have processes in place to refresh consent at appropriate intervals, including any parental consents.

We make it easy for individuals to withdraw their consent at any time, they can do so by putting it in writing (by email or letter to the pre-school manager) that they wish to withdraw their consent. We act on withdrawals of consent as soon as we can. We don't penalise individuals who wish to withdraw consent.

Staff sign a consent form to share and use their personal data as detailed in our privacy notice.

Personal Data Breach.

Leading Strings Pre-school are required to notify the ICO if we suffer a personal data breach. It is our duty to report certain types of data breach to the ICO, and in some cases, to individuals. We only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals - if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, you will also have to notify those concerned directly.

It is the managers responsibility that there is no data breach and to effectively detect, report and investigate a personal data breach.

Failure to report a breach when required to do so could result in a fine, as well as a fine for the breach itself.

Data storage and data security collecting new data or accessing existing data:

Hard copies such as interview notes, prints of photographs, child's learning journeys, application forms, videos children have recorded using ICT equipment- These are stored in our locked staff/store room - they can only be accessed by agreed members of staff.

We have permission from Ofsted to work off-site with children's learning journey's and reports. We adhere to our Storage Off-site Policy at all times.

Two-year-old and Transition reports are typed off-site, on password secure laptops/P.C; if saved on these then the child's name is disguised. Once printed they are deleted from the device and from the 'recycling bin.' Management is verbally told this by the staff member.

Staff confidential information is stored in a locked filing cabinet - accessed by the setting management and owner only.

Files - including computer files - that contain personal or identifiable data (such as names). These files are password protected, and only accessed by agreed members staff. Particular care must be taken if sharing files within the wider early years team, that they have secure GDPR policies in place.

Data Protection Officer:

(Lead practitioner who takes the lead on ensuring your setting is GDPR compliant).

Our Data protection officer is - **Kirsty Evensen**

Third party information sharing:

Leading Strings Pre-school must ensure that when information is shared with any third party, with permission, that they are complaint with the GDPR and they too are meeting the requirements of the GDPR and provide sufficient guarantees of this.

PRIVACY NOTICE: Leading Strings Pre-school - For Parent/Carers

General Data Protection Regulation (GDPR).

Leading Strings Pre-School is a data controller for the purposes of the GDPR (General Data Protection Regulation). We collect information from you and may receive information about you from your previous setting, local authority and/or the Department for education (DfE). We process this personal data and use it to:

- Assist families by providing information to families to enable them to make a considered choice when accessing education.
- Provide appropriate support and pastoral care including access to relevant support services that may be required.
- Improve services that impact on children's outcomes by assessing the data
- Monitor and report on children's progress and development.
- Display children's named work and photos to celebrate their achievements (within the pre-school setting)
- Apply for appropriate LA funding and support as required.
- The further use of any information will always be discussed with the parent/child and staff member before being shared.

PRIVACY NOTICE: Leading Strings Pre-school - For Staff

General Data Protection Regulation (GDPR).

Leading Strings Pre-School is a data controller for the purposes of the GDPR (General Data Protection Regulation). We collect information from you and from your previous employers whom you give as referees (this is a statutory Safeguarding and Welfare requirement of the EYFS)

We process this personal data and use it to:

- To book courses, training and online learning.
- Disclosure and Barring Service checks and using the Update Service annually to ensure circumstances have not changed.
- (New staff) Check previous employment details, job performance, any child protection concerns in those past roles through our reference request.

We only collect data which is lawfully required and has a purpose; we do not store it for any longer than is necessary. All data must be freely given, specific and fully informed. Consent must also be revocable (people can withdraw their consent at any time) Procedures are in place to action and record this when this happens.

Data required for funded hours:

The pre-school and LEA will collect/update the following data from the registration process and during your time with us, for funding purposes/eligibility:

This information includes contact details, attendance information, family benefit information as it relates to EYPP (Pupil Premium) eligibility, housing, information provided by the family / other agencies related to personal characteristics such as your ethnic group, any special educational needs, relevant medical information and details of services provided.

Who we share data with:

We will not give information about you to anyone outside this establishment without your consent unless the law and the school's policies permit it. We are required by law to pass some of your information to the Local Authority (LA) for monitoring, tracking and provision of appropriate services, to the Department for Education (DfE) and local children's centres. The LA and the DfE in turn are required to share some information with trusted partners including local NHS Trusts and other local authorities. Appropriate data will be used by certain Local Authority services to provide the best support possible to children and young people.

What will be the effect of this on the individuals concerned: -The data you provide will enable Leading Strings Preschool to provide the best education and care for your child.

You have the right to log a complaint with the ICO about any data concerns.

Individuals may request a copy of the information held about them. Under the GDPR such requests will need to be responded to within one month. Information must be provided for free/no cost. If you want to receive a copy of the information about your son/daughter that we hold, please contact: Individuals maintain the right to change any data that is incorrect and maintain the right not to have it processed if they ask Leading Strings Preschool not to do so.

• Kirsty Evensen, Setting Manager/Data Protection Officer

Leading Strings Pre-school, St John's Hall, Bourne Hill, Palmers Green, N13 4DA
office@leadingstrings.co.uk

Opt-in data consent:

Please sign and date (parent/carer) to confirm we 'Leading Strings Pre-school can use your and your child's personal data provided as detailed in this Privacy notice.

FULL NAME: _____ CHILD'S NAME: _____

SIGNED: _____ DATE: _____

This policy was agreed at a meeting on: 18/05/18

Present: Kirsty Evensen:

Debbie Franklin:

Reviewed by: May 2019