



The GDPR Rights for individuals

The right to be informed

As a registered Childcare provider with Ofsted, Central@RLK (Central Pre-school) is required to collect and manage certain data.

We need information on each parent including:

Full name

Address

Telephone numbers

Email address

Date of birth

National Insurance numbers

We require the following information for each child that attends:

Full name

Address

Date of birth

Birth Certificate/Passport number

For parents claiming the free nursery entitlement we are requested to provide this data to Swindon Borough Council; this information is sent to the Local Authority via a secure electronic file transfer system.

Visitors to the setting

We ask for the following details of all visitors to the setting:

Visitor's names

Company name

Date/time of visit

Who they are visiting

Reason for visit

Car registration number

This is in respect of our Health and Safety and Safeguarding Policies.



As an employer, Central@RLK is required to hold data on its employees, such as:

Full name

Address

Email address

Telephone number

Date of birth

National Insurance number

Photographic ID such as passport and driver's license

Bank details.

This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to CAPITA for the processing of DBS checks. Bank account details are stored in the online banking app.

The right of access

Central Pre-school is a charity registered in England & Wales. Registration No: 1032718.

At any point an individual can make a request relating to their data. The management will need to provide a response within 28 days. There will not be any charge for one-off requests, however this could incur a charge for excessive requests.

The right to rectification

Individuals are entitled to have personal data rectified if it is inaccurate or incomplete. Management must respond to any request to rectify data within one month from the request.

The right to erasure

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However Central@RLK has a legal duty to keep children's and their parent's details for a reasonable time. Details remain on the Blossom database for a limited time after a child leaves the pre-school. Children's accident and injury records for 21 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records. Staff records must be kept for 6 years after they leave the setting, before they can be erased. This data is archived securely onsite and shredded after the legal retention period.



The right to restrict processing

Parents, visitors and staff can object to Central@RLK processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

The right to data portability

Central@RLK requires data to be transferred from one IT system to another; such as from to the Local Authority, Blossom online communication system. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

The right to object

Parents, visitors and staff can object to their data being used for certain activities like marketing or research.

The right not to be subject to automated decision-making including profiling.

Central@RLK does not use personal data for marketing-based organisations.

Storage and use of personal information

- All paper copies of children's and staff records are kept in a locked office/cupboard in Central@RLK. Members of staff can have access to these files, but information taken from the files about individual children is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.
- Information about individual children is used in certain documents, such as, a weekly register, medication forms, referrals to external agencies and disclosure forms. These documents include data such as children's names, date of birth and sometimes addresses. These records are shredded after the relevant retention period.
- Central@RLK collects a large amount of personal data every year including; names and addresses of those on the waiting list. These records are shredded/deleted if the child does not attend or added to the child's file and stored appropriately.
- Information regarding families' involvement with other agencies is stored both electronically on an external hard drive and in paper format, this information is kept in the managers office. These records are shredded after the relevant retention period.
- If a child leaves Central@RLK, either moving on to school or moving settings, the data held on the child may be shared with the receiving school. Such information will be hand delivered to the school/setting. For children attending



a school outside of Swindon the parent/carer will be given the data to deliver to the receiving school.

- Central@RLK stores personal data held visually in photographs or video clips or as sound recordings. No names are stored with images in photo albums, displays, on the website or on the Facebook page. Photographs, video clips and sound recordings are uploaded to Blossom.
- Access to all Office Laptops and Blossom is password protected. When a member of staff leaves Central@RLK they no longer have access to the Tablets or Laptops in line with this policy and our Safeguarding policy. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet.

Data Breaches

In the event of a personal data breach, the Data Protection Controller should be notified immediately and an investigation carried out. Central@RLK will be investigated and reported to the supervisory authority within 72 hours. The Individual will also be informed if a breach of personal data occurs. Central@RLK will keep a log of any breaches.

Consent

Where consent is required for a child at Central@RLK, parental consent will be sought.

Central@RLK will be specific and 'granular' when requesting consent, so parents may be required to complete separate consent for separate requirements. Central@RLK will always ensure it has a legitimate reason for processing any personal data.

GDPR means that Central@RLK must:

Manage and process personal data properly

Protect the individual's rights to privacy

Provide an individual with access to all personal information held on them

Staff Responsibilities

Staff need to know and understand:

- How to manage, keep and dispose of data
- The pre-school's procedures in relation to children's records, email, social media, taking photos in the pre-school, taking videos and photos on the preschool tablets, mobile technology and the pre-school website
- When they are allowed to share information with others and how to make sure it is kept secure when shared.



Individuals must not:

- Allow anyone else to use their user password to log into Blossom
- Leave their password unprotected (for example writing it down).
- Perform any unauthorised changes to pre-school Laptops and tablets.
- Attempt to access data that they are not authorised to use or access.
- Exceed the limits of their authorisation or specific business need to interrogate the system or data.
- Store Central@RLK data on any non-authorised IT equipment.
- Give or transfer Central@RLK data or software to any outside person or organisation without the authority of management.

Access to staff personal data

Employees are allowed to have access to all personal data about them held on manual or computer records under the Data Protection Act (1998). The Act requires the organisation to action requests for access to personal data within one month. Should an employee request access to their personal data, the request must be addressed in writing to the relevant line manager. The request will be judged in the light of the nature of the personal data and the frequency with which they are updated. The employee will be informed whether or not the request is to be granted. If it is, the information will be provided within one month of the date of the request. In the event of a disagreement between an employee and the line manager regarding personal data, the matter should be taken up under the pre-school grievance procedure.

The right of employees to see information held about them is extended to information held in paper record-keeping systems as well as computerised systems. Exclusions apply – References.