



The Goslings Preschool

Registered Charity No. 1209514

General Data Protection Regulation (GDPR) Policy

The General Data Protection Regulation (GDPR) replaced the Data Protection Act (1998) and came into effect on 25th May 2018. GDPR gives individuals greater control over their own personal data; how it is collected, stored and destroyed. As a preschool, it is necessary for us to collect personal information about the children who attend our setting, as well as their parents/carers, our employees and committee members.

The Data Protection Principles of GDPR are as follows:

1. Data is processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data is accurate and, where necessary, kept up to date.
5. Data is not kept for longer than necessary.
6. Data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

All preschool staff, committee members and volunteers must adhere to these principles and our GDPR policy at all times.

GDPR means that The Goslings Preschool must:

1. Manage and process personal data properly.
2. Protect the individual's rights to privacy.
3. Provide individuals with access to all personal data that is held on them.

GDPR includes 7 rights for individuals:

1. The right to be informed: The Goslings Preschool is a registered childcare provider with Ofsted and is required to collect and manage certain data, including parents' names, addresses, telephone numbers, email addresses, date of birth, National Insurance number, as well as children's full names, addresses and date of birth, family medical history, photographs and, for parents claiming free childcare entitlement, we have to provide relevant data to Cheshire East Council, using secure communications. We collect details of any visitors to the preschool (e.g. names, telephone numbers, addresses) and as an employer, The Goslings is required to hold data for its employees; names, addresses, telephone numbers, date of birth, bank details, National Insurance number, photographic identification (e.g. passport, driving licence). This information is also required to perform Disclosure and Barring Service (DBS) checks to confirm eligibility to work in the United Kingdom and whether they are able to work in a preschool setting. Information for such checks is sent via a secure file transfer system to the processor of the DBS checks. The Goslings Preschool website uses cookies to collect data anonymously for Google Analytics.

2. The right to access: at any point, an individual can make a request relating to their data. The Goslings Preschool will need to provide a response to any requests within one month. The Goslings can refuse a request if there is a lawful obligation to retain the data, such as from Ofsted in relation to the EYFS. In such instances, we will always inform the individual of the reasons for rejection. The individual has the right to complain to the Information Commissioner's Office (ICO) if they are unhappy with the decision.
3. The right to erasure: an individual has the right to request deletion of their data where there is no compelling reason for its continued use. However, The Goslings Preschool has a legal duty to retain details of children and their parents for a reasonable amount of time; by law, The Goslings is required to retain their records until three years after the child has left the preschool. Accident and injury records must be kept until the child reaches the age of 21. Child protection records must be retained until the child reaches the age of 24. Staff records must be kept for 6 years after employment ceases. All of the data that we retain is archived securely; in a locked cupboard for paper-based data and in a password-protected encrypted storage cloud for electronic data. Paper-based data is shredded after the legal retention period.
4. The right to restrict processing: parents, visitors and staff can object to The Goslings Preschool processing their data. This means that records can be stored, but must not be used in any way.
5. The right to share data: The Goslings Preschool requires some data to be shared with a third party, such as the Local Authority (Cheshire East). These recipients use secure, file transfer systems and have their own policies and procedures in place relating to GDPR.
6. The right to object: Parents, visitors and staff can object to their data being used for certain activities, such as marketing or research.
7. The right to not be subject to automated decision-making, including profiling: The Goslings Preschool does not use personal data for such purposes.

Storage and Use of Personal Information

All paper copies of children and staff records are kept securely in a locked filing cabinet at the preschool. The Preschool Manager and Deputy Manager have access to all records, with other staff having limited access on a need-to-know basis.

Electronic records (e.g. those held on a computer) are held in a password-protected encrypted storage cloud and can only be accessed by the Preschool Manager (the 'Data Controller') and Deputy Manager.

Records are kept on site at all times. The children's learning journeys (also referred to as profiles), containing the child's name only and photographs of them doing various preschool activities, are taken home periodically by the child's key person to review and complete any documenting of recent learning activities. When stored off-site, the learning journeys are kept in a locked cabinet and are then returned to the secure cabinet at the preschool. Learning journeys are only taken off site once parental consent has been obtained, with parents being informed that these only contain their child's name and photographs of their learning activities (e.g. no date of birth, address or other contact details).

Archived records are shredded after the retention period recommended by the Early Years Alliance.

In order to fulfil their role and to supervise and support the operations of The Goslings Preschool, the Chairperson, Treasurer, Secretary and other nominated members of the preschool parent committee may also handle confidential information, including the names and addresses of parents.

All information held (paper-based and electronic/digital records) will be kept confidential by the parent committee and staff. In the event of there being any wrongful disclosures of confidential information, it will be investigated immediately.

Upon a child leaving The Goslings Preschool and moving on to school or a new setting, data held on the child may be shared with the receiving school/setting. Such information will be sent via a secure file transfer system, or via the local authority's (Cheshire East) internal postal service. For children who will be attending a school/setting outside of the local authority, the data will be given to the parent to delivery to the receiving school/setting.

It is the parent's responsibility to ensure that the information given to us in the registration forms is correct and kept up to date.

The Data Controller and Designated Data Controllers

The Goslings Preschool is responsible for the implementation of GDPR, with our Designated Data Controllers dealing with day-to-day matters:

- Julie Harris – Preschool Manager and Data Protection Officer / Data Controller
- The Goslings Preschool Parent Committee

Our Data Protection Officer is Julie Harris. Both the Data Protection Officer, Preschool Manager and Chairperson have received training on GDPR, together with the rest of the staff.

If any person wishes to know what information we hold on them, they should contact our Data Protection Officer, Julie Harris.

This Policy has been reviewed and agreed by The Goslings Management Team and Parental Committee.