

10.16 Data Protection – GDPR Policy statement

Policy statement

Hempstead Pavilion Playgroup Ltd aims to fulfil its obligation under the General Data Protection Regulation (GDPR) 2017 to the fullest extent. This policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collecting, processing, using, storing, sharing and disposing of personal data.

We have appointed a Data Protection Lead who is responsible for ensuring our compliance with the GDPR.

Their contact details are:

- Name: Tracy Moodie
- Contact Number: (07846) 803969
- Email: hempstead.pavilion@outlook.com

We are registered with Information Commissioners Office (ICO). Our registration reference is ZA231168.

All our staff and volunteers have undertaken training in GDPR and are aware of their responsibilities in collecting, using and sharing data.

We have a privacy notice that sets out the lawful bases for processing the data, the legitimate interests for the processing, individual's rights and the source of the personal data.

We have a process in place to record any data breaches and a form for reporting breaches to the ICO and any investigations.

We have a policy for the retention of documents and archiving of them.

We have an asset register in place to record the different types of information and documentation that we hold. This is updated regularly. We also have a spreadsheet showing how information is processed, stored and shared.

Procedure

Hempstead Pavilion Playgroup Ltd are aware that data protection legislation applies equally to children and staff. Article 5 of the GDPR sets out the principles that we work:

- Data must be processed fairly, lawfully and in a transparent manner.
- Data must only be obtained for specified and lawful purposes.
- Data must be adequate, relevant and not excessive (limited to what is necessary).
- Date must be accurate and up to date.
- Data must not be kept longer than necessary.
- Data must be securely kept.

We use the GDPR rights for individuals.

- The right to be informed
- The right of access
- The right of rectification
- The right of erasure
- The right of restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

The following procedures apply to information held about children.

1. A child's educational records will be disclosed to their parent or carer on submission of a written request. Requests will only be refused if it is obvious the requester does not understand what they are asking for, or if disclosure is likely to cause them or anyone else serious physical or mental harm.
2. A child's education records will be made available with charge within 15 working days of receipt of the written request. If a copy of the information is requested, a charge may be made but it will not exceed the cost of supply.

3. (Required for maintained schools only)

When a child moves to a new school, a completed Transition report with all educational records relating to the child will be sent to the new school. This includes copies of reports and any personal education plans. To ensure security, these reports are hand delivered by Management. If a new school is not known, every effort will be made to contact the parents or carers by post, telephone or email.

(Required for other early years setting)

When a child moves to another Early Years establishment, a completed Transition report with all educational records relating to the child will be sent to the new setting. This includes copies of reports and any personal education plans. To ensure security, this report is given to the parents to take to their next setting and the parents will sign to confirm it has been taken. If a new Early Years setting is not known, every effort will be made to contact the parents or carers by post, telephone or email.

4. Children's records will be stored securely. Paper files are locked in the filing cabinet in the settings office and are only accessible by staff, volunteers do not have access to these files. Electronic files are stored on the settings computer. Computers within the setting are kept secure with appropriate software to ensure maximum protection against ransom and malware which is regularly updated. All data is securely backed up on an external hard drive which is locked in the filing cabinet at the setting.
5. Information that is shared is done securely using a secure email system and password protection of the document.

The following procedures apply to information held about staff.

1. Staff personal files are to be read and checked every September, they are to read carefully, and staff are required to inform Tracy Moodie at the earliest opportunity if they believe that anything is inaccurate or untrue, or if they are dissatisfied with the information in any way.

2. Requests for additional access must be sent to Tracy Moodie. Each request will be judged in light of the nature of the information in question and the frequency with which it is updated. The member of staff will then be informed whether or not the request is granted. In event of a disagreement, the matter will be taken up under the formal grievance procedure.

3. If a request for additional access is granted, the information will be provided within 30 days of the date of the request. A fee will not be charged to gain access to the data. However, we can charge a “reasonable fee” if a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.

The following procedures apply to any third parties that we are contracted with:

We have contracts with the following organisations.

PAYROLL AND ACCOUNTS

Michael Morris Accountancy Services Ltd
 123 High Street
 Rainham
 Kent
 ME8 8AN.

PENSION SCHEME

Nest Pension Scheme
 Nene Hall
 Lynch Wood Business Park
 Peterborough
 PE2 6FY

- We have documentation from each contractor confirming their compliance with GDPR.
- We have agreed safe sharing of information.
- Confidentiality agreements are in place.

This policy was adopted by

Hempstead Pavilion Playgroup Ltd

On

25th May 2018

Date to be reviewed

31st July 2019

Signed on behalf of the provider

Name of signatory

Tracy Moodie

Role of signatory

Director