

Data Protection Policy Statement

Please also refer to our Child Protection Policy, Confidentiality Policy, Code of Conduct, Tapestry Policy and Photographic Policy.

Guidance

Freedom of Information Act 2000

The Data Protection Act 2018

Early Years Statutory Framework – September 2021

National Cyber Security Centre. Early Years practitioners: using cyber security to protect your settings – 2021

Statement of Intent

Box Pre School Playgroup is required to collect personal information for its employees, trustees, children, parents, and visitors. It is also necessary to process information so that staff can be recruited and paid, activities organised and legal obligations to funding bodies. We intend to meet all the requirements of the Data Protection Act 2018 (the Act) when collecting, storing, and destroying personal data. We also gather information with reference to the EYFS 2021 – sec 3.69-3.72.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this Box Pre School Playgroup must comply with the Data Protection Principles which are set out in the Data Protection Act 2018. In summary these state that personal data must be:

- obtained and processed fairly and lawfully;
- obtained for a specified and lawful purpose and not processed in any manner incompatible with that purpose; adequate, relevant, and not excessive for that purpose;
- accurate and kept up to date;
- not kept for longer than is necessary;
- processed in accordance with the data subject's rights;
- kept safe from unauthorised access, accidental loss, or destruction;

- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

All Box Pre school playgroup staff and volunteers who process or use any Personal Information must ensure that they follow these principles at all times. In order to ensure that this happens Box Pre School Playgroup has adopted this Data Protection Policy.

Notification of Data Held and Processed

All employees, trustees, parents, visitors, and other members of the public have the right to:

- know what information Box preschool playgroup holds and processes about them and why;
- know how to gain access to it;
- know how to keep it up to date;
- know what Box preschool playgroup is doing to comply with its obligations under the Act.

The Data Controller and the Designated Data Controllers

Box Pre school playgroup as a registered charity is the Data Controller under the Act, and the organisation is therefore ultimately responsible for implementation. However, Designated compliance officers will deal with day to day matters. Box Preschool Playgroup's Designated compliance officer is Yvonne Jenkinson (supervisor).

Personal Information

Personal Information is defined as any details relating to a living, identifiable individual. Within Box Pre School Playgroup this relates to employees; attending children and their families; trustees; professional visitors; and some members of the public e.g. job applicants. We need to ensure that the information gained from each individual is kept securely and to the appropriate level of confidentiality.

The personal information collected from individuals could include:

- Their name

- Address
- Email address
- Telephone numbers-including those of emergency contacts
- Date of birth
- Medical information
- National Insurance number
- DBS numbers
- Observations of children's progress (learning journals on Tapestry)
- Children's reports, preschool or from outside professionals.
- Photographs
- Family medical history when necessary

Processing of Personal Information

All staff and volunteers who process or use any Personal Information are responsible for ensuring that:

- Any Personal Information which they hold is kept securely;
- Personal Information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

Staff and volunteers should note that unauthorised disclosure will usually be a disciplinary matter and may be considered gross misconduct in some cases.

Procedures at Box Pre School Playgroup

This procedure covers Technical, Organisational and Physical Security Measures.

Technical

Box Pre-School uses data stored on:

- a password protected and encrypted computer and laptop
- visual images on a digital camera and Ipads/tablets
- Box Pre-School website
- Tapestry (on line learning journal website)

o Letters

o Forms

o Notes for the Record

These components are stored in filing cabinets in a locked cupboard within the locked building. The computer, camera, Ipads/tablets and paper data (except children's development folders) can only be

transported by staff and committee members with the permission of the Supervisor or Deputy.

The people removing data or items undertakes to keep the data or items in a secure and confidential environment, whilst it is in their care.

Organisational

Box Pre-School has a Confidentiality Policy which all staff, committee members and parents are made aware of.

Risk Assessments are carried out on a daily, termly and ad-hoc basis and signed off by the compliance officer.

Box Pre-School uses the following reports on a daily/termly basis:

- Accident Book
- Incident Book and Forms
- Changing Record
- Fire Drill Book
- Observational Sheets
- Activity Plans
- Planning Sheets
- General letters to parents e.g. newsletters

These books and forms are kept in the office cupboard and are locked away at the end of each session. All materials are archived for the appropriate legally required timings.

Staff and committee personnel files are maintained by the individuals themselves and are kept locked in the cupboard. Personnel files contain details of address, Personal data

Conversations and Meetings

Information of a personal or confidential nature should not be discussed in a public area, in front of anyone that is not an employee of the preschool. Preschool employees should be aware of confidentiality at all times when discussions are taking place, either distancing themselves from the conversation if it does not concern them, or, ensuring that their discussion is not overheard by others. All staff should respect the confidential nature of any information inadvertently overheard.

When meetings are being recorded it is important that only relevant information is written down. This must be carried out using the correct forms provided by the preschool, notes must be written legibly and coherently. The written notes are then to be stored in a locked cupboard

and disposed of (shredded) in a timely manner once the child/family have left the setting (1 year unless of a child protection nature).

Collecting Information

Whenever information is collected about people, they should be informed why the information is being collected, who will be able to access it and to what purposes it will be put. The individual concerned must agree that he or she understands and gives permission for the declared processing to take place, or it must be necessary for the legitimate business of the preschool. We have a privacy notice that is signed by data subjects and sets out the main information we collect, what it is used for and how to update the information.

Sensitive Information

Sensitive information is defined by the Act as that relating to ethnicity, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, criminal proceedings or convictions. The person about whom this data is being kept must give express consent to the processing of such data, except where the data processing is required by law for employment purposes or to protect the vital interests of the person or a third party.

Disposal of Confidential Material

Sensitive material should be shredded as soon as it is no longer needed; following retention guidelines and statutory requirements. Particular care should be taken to delete information from the tablets or the computer hard drive if they are to be disposed of.

Staff Responsibilities

All staff are responsible for checking that any information that they provide to Box Preschool Playgroup in connection with their employment is accurate and up to date. Staff have the right to access any personal data that is being kept about them, either on computer or in manual filing systems. Staff should be aware of and follow this policy and seek further guidance where necessary. Staff are required to sign a privacy notice in this respect.

Duty to Disclose Information

There is a legal duty to disclose certain information, namely, information about: Child abuse, which will be disclosed to social services, or Drug trafficking, money laundering or acts of terrorism or treason, which will be disclosed to the police.

Retention of Data

Box Preschool Playgroup takes care to only store personal information that is absolutely necessary.

Personal information is kept for the period of time requested following guidelines from the Preschool Learning Alliance, these retention periods are either recommended or statutory.

Stored information is filed in locked filing cabinets until such time it can be destroyed.

Data Processors

Agreements are in place with persons who process data on our behalf such as PayStaff , Tapestry (on line learning journals) and web designers.

Cyber Security

We are aware of the importance of cyber security and our safeguarding role. We follow the four steps outlined below to reduce the likelihood of being a victim of cyber attacks

1. We regularly back up important information
2. Passwords are used to access computers, devices and documents.
3. We protect our devices from viruses and malware.
4. We are alert to suspicious messages and unusual requests (phishing attacks). If we receive a suspicious email we will report it to report@phishing.gov.uk

