

Information and Records Policies



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6.1a Clockhouse Pre-school's Privacy Notice for Staff and Volunteers

Policy statement

We are committed to ensuring that any personal data we hold about you is protected in accordance with data protection laws and is used in line with your expectations. This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

What personal data do we collect?

We collect personal data about you to provide high quality care and learning to the children in our care.

- Personal and sensitive data that we collect about you may include your name, home address, email address, phone numbers, emergency contact details, languages spoken, religious beliefs. Your date of birth & national insurance number or unique taxpayer reference (UTR) if you're self-employed. This information will be collected from you directly in your application form, CV and in the processing of your DBS check and EY2 (if applicable).
- If you contact us by email or through our website, then we will store and process the information you provide in our email system as required. We will continue to store your email address only, so we can invite you to future events.

Why we collect this information and the legal basis for handling your data

Contract

We use personal data about you in order to fulfil the contractual arrangement we have entered into. This includes using your data to:

- Communicate with contact you in case of an emergency
- Communicate with you to organise working schedules, training and ad hoc matters

Consent

With your consent, we display your picture and some information about you on our parent's noticeboard, our website and social media channels.

Legal Obligation

We have a legal obligation to process safeguarding related data about you should we have concerns about your welfare or a child's welfare. We also have a legal obligation to transfer records and certain information about you to future workplaces and to comply with statutory visits and inspections.

Legitimate Interest

We record CCTV images to protect the building and the people using it, the areas covered are the car park, garden, and the main hall. We retain recordings for 21 days, in order that any issues are highlighted before the data is deleted.

We will continue to hold your email address only after you leave so that we can invite you and your family to reunion events and other celebrations.

Who we share your data with:

In order for us to deliver childcare services we will also share your data as required with the following categories of recipients:

- Ofsted – during an inspection or following a complaint about our service
- banking services to make payments (as applicable)
- the Local Authority
- our insurance underwriter (if applicable)

We will also share your data if:

- we are legally required to do so, for example, by law, by a court or the Charity Commission.
- to enforce or apply the terms and conditions of your contract with us.
- to protect you, your child and other children; for example, by sharing information with social care or the police.
- it is necessary to protect our or others' rights, property or safety
- we transfer the management of the setting; in which case we may disclose your personal data to the prospective buyer so they may continue the service in the same way.

We will never share your data with any other organisation to use solely for their own purposes, without your consent.

How do we protect your data?

We protect unauthorised access to your personal data and prevent it from being lost, accidentally destroyed, misused, or disclosed by:

- Keeping all paper copies of documentation in a locked filing cabinet, which is only accessible to the Manager or Deputy.
- Keeping all electronic information including CCTV images, on a password & virus protected cloud or physical hard drive, which is only accessible to the Manager or Deputy.
- Ensuring that all staff and volunteers are trained on GDPR and confidentiality.

How long do we retain your data?

We retain your personal data for up to 7 years, or until our next Ofsted inspection. Attendance records and accident records are kept for longer according to legal requirements. In some instances (child protection, or other support service referrals) we are obliged to keep your data for longer if it is necessary to comply with legal requirements (see our Children's and Provider Records policies).

How is personal information destroyed?

When it is no longer needed –

- Computer data is securely deleted.
- Paper documents are shredded.

Automated decision-making.

We do not make any decisions about you based solely on automated decision-making.

Your rights with respect to your data

You have the right to:

- request access, amend or correct your personal data
- request that we delete or stop processing your personal data, for example where the data is no longer necessary for the purposes of processing; and
- request that we transfer your personal data to another person

If you wish to exercise any of these rights at any time or if you have any questions, comments or concerns about this privacy notice, or how we handle your data please contact us.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk/

Changes to this notice

we keep this notice under regular review. You will be notified of any changes where appropriate.

6.1b Clockhouse Pre-school's Privacy Notice for Children, Parents and Carers

Policy statement

We are committed to ensuring that any personal data we hold about you and your child is protected in accordance with data protection laws and is used in line with your expectations. This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

What personal data do we collect?

We collect personal data about you and your child to provide care and learning that is tailored to meet your child's individual needs. We also collect information in order to verify your eligibility for free childcare and other funding, as applicable.

Personal and sensitive data that we collect about your child may include:

- Your child's name, date of birth, citizenship, gender, racial/ethnic origin, address, languages spoken, religious beliefs, health and medical needs, development needs, and any special educational needs.
- Where applicable we will obtain child-protection plans from social care and health care plans from health professionals.
- We will also ask for information about who has parental responsibility for your child and any court orders pertaining to your child.

Personal and sensitive data that we collect about you may include:

- Your name, home and work address, email address, phone numbers, emergency contact details, languages spoken, religious beliefs and family details. Your date of birth & national insurance number or unique taxpayer reference (UTR) if you're self-employed.
- We may also collect information regarding benefits and family credits that you are in receipt of.

This information will be collected from you directly in the registration form, parental declaration form and application to join form. If you contact us by email or through our website, then we will store and process the information you provide in our email system until your child leaves us. We will continue to store your email address only, so we can invite you to events.

Why we collect this information and the legal basis for handling your data.

Contract

We use personal data about you and your child in order to provide childcare services and fulfil the contractual arrangement you have entered into.

This includes using your data to:

- contact you in case of an emergency
- support your child's wellbeing and development
- manage any special educational, health or medical needs of your child whilst at our setting
- carry out regular assessment of your child's progress and to identify any areas of concern
- maintain contact with you about your child's progress and respond to any questions you may have
- process your claim for up to 30 hours free childcare (only where applicable)
- keep you updated with information about our service

Consent

With your consent, we will also record your child's activities for their individual learning record. This may include photographs and videos. You will have the opportunity to withdraw your consent at any time, for images taken by confirming so in writing.

Legal Obligation

We have a legal obligation to process safeguarding related data about your child should we have concerns about their welfare. We also have a legal obligation to transfer records and certain information about your child to the school that your child will be attending (see Transfer of Records policy) and to comply with statutory visits and inspections.

Legitimate Interest

We record CCTV images to protect the building and the people using it. The areas covered are the car park, garden, and main hall. We retain recordings for 21 days, in order that any issues are able to be highlighted before the data is deleted.

We will continue to hold your email address only after your child's records have been destroyed so that we can invite your family to reunion events and other celebrations.

Who we share your data with?

In order for us to deliver childcare services we will also share your data as required with the following categories of recipients:

- Ofsted – during an inspection or following a complaint about our service
- banking services to make payments (as applicable)
- the Local Authority (where you claim up to 30 hours free childcare as applicable)
- the government's eligibility checker (as above)
- our insurance underwriter (if applicable)
- the school that your child will be attending

We will also share your data if:

- we are legally required to do so, for example, by law, by a court or the Charity Commission.
- to enforce or apply the terms and conditions of your contract with us.
- to protect your child and other children; for example, by sharing information with social care or the police.
- it is necessary to protect our or others' rights, property or safety
- we transfer the management of the setting; in which case we may disclose your personal data to the prospective buyer so they may continue the service in the same way.

we will never share your data with any other organisation to use solely for their own purposes, without your consent.

How do we protect your data?

We protect unauthorised access to your personal data and prevent it from being lost, accidentally destroyed, misused, or disclosed by:

- Keeping all paper copies of documentation in a locked filing cabinet, which is only accessible to the Manager or Deputy.
- Keeping all electronic information including CCTV images, on a password & virus protected cloud or physical hard drive, which is only accessible to the Manager or Deputy.
- on password & virus protected hard drive, which is also locked away when not in use and is only accessible to the Manager or Deputy.
- Ensuring all staff and volunteers are only given access to information about you or your child if it is relevant and necessary for their role.
- Ensuring that all staff and volunteers are trained on GDPR and confidentiality.

How long do we retain your data?

We retain your child's personal data for up to 3 years, or until our next Ofsted inspection after your child leaves our setting. Medication records and accident records are kept for longer according to legal requirements. Your child's learning and development records are maintained by us and handed to you when your child leaves. In some instances (child protection, or other support service referrals) we are obliged to keep your data for longer if it is necessary to comply with legal requirements (see our Children's and Provider Records policies).

How is personal information destroyed?

When it is no longer needed –

- Computer data is securely deleted.
- Paper documents are shredded.

Automated decision-making.

We do not make any decisions about your child based solely on automated decision-making.

Your rights with respect to your data

You have the right to:

- request access, amend or correct your/your child's personal data
- request that we delete or stop processing your/your child's personal data, for example where the data is no longer necessary for the purposes of processing; and
- request that we transfer your, and your child's personal data to another person

If you wish to exercise any of these rights at any time or if you have any questions, comments, or concerns about this privacy notice, or how we handle your data please contact us.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk/

Changes to this notice

We keep this notice under regular review. You will be notified of any changes where appropriate.

6.1c Clockhouse Pre-school's Privacy Notice for Other Users of the Shared Building

Policy statement

We are committed to ensuring that any personal data we hold about you is protected in accordance with data protection laws and is used in line with your expectations. This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

What personal data do we collect?

We collect personal data about you via the CCTV images recorded within the publicly accessible areas of the building.

Why we collect this information and the legal basis for handling your data.

Legitimate Interest

We record CCTV images to protect the building and the people using it. The areas covered are the car park, garden, and the main hall. We retain recordings for 21 days, in order that any issues are able to be highlighted before the data is deleted.

Who we share your data with?

In order for us to deliver childcare services we will also share your data as required with the following categories of recipients:

- Our insurance underwriter (if applicable)
- A designated member of the Church Council

We will also share your data if:

- we are legally required to do so, for example, by law, by a court or the Charity Commission.
- to protect you and others; for example, by sharing information with social care or the police.
- it is necessary to protect our or others' rights, property, or safety

How do we protect your data?

We protect unauthorised access to your personal data and prevent it from being lost, accidentally destroyed, misused, or disclosed by:

- Keeping all electronic information including CCTV images, on a password & virus protected cloud or physical hard drive, which is only accessible to the Manager or Deputy.

How long do we retain your data?

We retain recordings for 21 days

How is personal information destroyed?

When it is no longer needed –

- CCTV data is recorded over automatically

Your rights with respect to your data

You have the right to:

- request access to your personal data
- request that we delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and

If you wish to exercise any of these rights at any time or if you have any questions, comments, or concerns about this privacy notice, or how we handle your data please contact us.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk/

Changes to this notice

We keep this notice under regular review. You will be notified of any changes where appropriate.

6.1d Tapestry privacy policy

The Service

Schools and nurseries pay The Foundation Stage Forum to provide them with a service that allows them to create online learning journals for children under their care and to share them with their staff and, if the school or nursery wishes, the children's parents and relatives.

What data do we collect?

For each school or nursery, we store:

- The name and address of the school or nursery
- The name, email address and telephone number of the person at the school or nursery who pays for our service.

We store this information in order to administer and charge for our service. The school or nursery may then store some or all of the following data on our service:

- The names and email addresses of their staff
- The names, dates of birth and addresses of their children
- The names and email addresses of the parents and relatives of their children
- The contents of a learning journal:
 - assessments of children's performance
 - notes, photographs and videos of the children

The school or nursery stores this information in order to record, analyse and, if they wish, share the progress of their children. The school or nursery has the freedom to choose which of the above data they store, and are able to delete it at will. The school or nursery choose who has access to the data.

In providing the service, we will send automated emails to staff and parents in order to confirm email addresses, reset passwords and notify them of events relating to the school or nursery (such as when a new observation is added about a child). We never send any marketing information, though we do send staff a newsletter about Tapestry.

We ONLY access the data stored by the school or nursery about staff, children or relatives when we have to in order to maintain the service to the school or nursery, or to fix faults.

We collect the following information from visitors to our sites:

- IP addresses
- Information about their web browser and computer

- What pages people look at (e.g., the list of observations), but not the content of those pages (i.e., we could not tell directly from the data whether the list of observations contained information about a particular child, though given time and access to the data above it would be possible to figure that out)

We use this information to monitor the security of our service, to help us figure out how to improve the service (e.g., what browsers should we support? how much capacity should we add?) and to improve the way we market the service (e.g., what search terms were used to discover our site).

We collect the following information from users of our phone and tablet applications:

- The make and model of the device
- The version of the operating system
- Details of any crashes that occur in the application
- What screens people look at in the application (e.g., the list of observations), but not the content of those screens (i.e., we could not tell directly from the data whether the list of observations contained information about a particular child, though given time and access to the data above it would be possible to figure that out)

We use this information to help us figure out how to improve the service (e.g., what causes crashes? which crashes need fixing most urgently?)

We collect a person's email address and the contents of their email when someone contacts us by email or through our support ticket system. We use this information to respond to questions or problems raised by our users.

Who owns the data?

The school or nursery own the data they place in our service. We do not. Formally, in ICO terms, the school or nursery are the “Data Controller” and we are the “Data Processor”.

Who do we share data with?

We do not share data, except as explicitly requested by the school or nursery. If they wished, the school or nursery might give staff, parents or relatives access to data. They might download or print some or all of the data and share it with their staff, parents or the government.

They might transfer some of the data to a different nursery that uses Tapestry.

We, the Foundation Stage Forum Ltd, ONLY access the data stored by the school or nursery in order to carry out the school or nursery's instructions, to maintain the service to the school or nursery, or to fix faults.

How do we collect the data?

Most of the data is entered by the staff at the nursery or school directly into our website or through our phone and tablet applications. The nursery may, if they wish, permit parents and relatives of children to add data to the service.

We store cookies on users' computers in order to verify that the user is logged in and to store their preferences. The cookies themselves do not contain any identifiable information about the user or about what they are looking at.

The information about the computers that visit our site is collected by Google Analytics. No information that is stored by the school or nursery on our system is sent to Google (i.e., Google doesn't get to see anything about the staff, parents or children). You can read Google's privacy policy here: <https://support.google.com/analytics/answer/6004245?hl=en>. The information about the make and models phones and tablets that use our applications and the crash reports from when our app crashes is collected by Crashlytics. No information that is stored by the school or nursery on our system is sent to Crashlytics (i.e., Crashlytics doesn't get to see anything about the staff, parents or children children). You can read the Crashlytics privacy policy here: <https://try.crashlytics.com/terms>

Can I have my data corrected or deleted?

Yes. The school or nursery can correct or delete the data they store about their staff, children or parents. The school or nursery can correct the information we store about them through their Foundation Stage Forum account. They can also contact us and we will correct or delete it on their behalf. The process of deletion is gradual: initially deleted data is moved to a 'deleted' area in case it was deleted in error. After a delay, it is then permanently deleted from our main systems. After a further delay, it is then permanently deleted from our backups.

What are the school or nursery's responsibilities?

The school or nursery that uses our service has overall responsibility for complying with the Data Protection requirements (or the equivalent in other countries).

When they take out a Tapestry subscription, they agree to our terms and conditions, which are available from within the Tapestry control panel at any time. It is important that the school or nursery have taken care to:

- Think about what information it is appropriate to share with whom, given their situation and that of the children under their care.
- Ensure they have permission from parents or carers for the data they store about them and the way that they use that data.
- Train their staff about sensible security and confidentiality precautions:
- Taking care of passwords
- Taking care not to install software on computers that may compromise security.
- Taking care not to access material from inappropriate places where it can't be kept appropriately confidential.
- Prevent access to Tapestry for parents whose children have been made inactive or have been deleted, unless they have other children at your setting.
- Give parents instructions for keeping the data protected, e.g. by insisting no photos are uploaded to social media sites without the written permission of the parents whose children are depicted in photos, videos or text.