



Dear Parents and Carers,

GDPR Privacy Notice

You may be aware of new changes in UK regarding data protection rules. The 'General Data Protection Regulation' (GDPR) will make changes as to how we can use your personal data and continue to ensure it is safe. The GDPR will strengthen your rights over your own data and Constable Country Childcare will refine and alter data protection methods to keep sensitive and private information about yourselves and your children safe. This letter will set out relevant details of the new regulation and how Constable Country Childcare will be applying the GDPR in protecting your data.

Constable Country Childcare needs to keep certain information about its employees, trustees, children and parents/carers. This is to satisfy its obligations to Ofsted and other regulatory bodies and information is often used by Constable Country Childcare to monitor learning, performance and achievements. To comply with the law, information will be collected and used transparently, stored safely and information will not be disclosed to any other person or body unlawfully. Responsibilities of data protection are not limited to sensitive data and apply to all data including names and addresses.

You may withdraw your consent at any time by contacting myself via email at hayley@constablecountrychildcare.co.uk.

The GDPR emphasises key rights for individuals:

1) The right to be informed:

Constable Country Childcare is a registered Childcare provider with Ofsted and therefore is required to collect and manage certain data. Individuals have the right to be informed about the collection and use of their personal data. Constable Country Childcare hold a high standard of transparency regarding privacy information. If you have any questions about why or how we intend to keep your information please contact us.

For parents/carers we need to know: names, addresses, telephone numbers, email addresses, parental rights, date of birth and National Insurance numbers. We have recently also been advised to ask for the addresses of main carers workplace in case of emergencies.

For each child we need to know: their full name, primary address, date of birth and we hold copies of birth certificates or passports (which are kept securely).

For parents claiming nursery entitlement we are required to provide the above data to Suffolk County Council.

Further, we are required to collect certain details of visitors and contractors involved in our settings. We need to know names, telephone numbers, addresses and where appropriate details of relevant companies or organisations. This is solely for Health and Safety and

Safeguarding Policies.

As an employer Constable Country Childcare is required to hold data on its employees. This includes names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID (such as passport and driver's license) and relevant bank details. This information is required for Disclosure and Barring Service (DBS) checks and proof of eligibility to work in the UK.

When such information is sent, it is sent via a secure file transfer system to UKCRBs for the processing of DBS checks.

2) The right of access:

At any point individuals may make an access request relating to their data in written form. Constable Country Childcare will provide a response within one month. Individuals maintain the right to make a complaint to the Information Commissioner's Office or another supervisory authority; and their ability to seek to enforce their rights through a judicial remedy, if they find any issues with accessing data.

Constable Country Childcare will not generally charge a fee for a subject access request. However, within the GDPR, Constable Country Childcare hold to right to charge a 'reasonable fee' where the request is manifestly unfounded or excessive. Constable Country Childcare may also charge a reasonable fee if an individual requests further copies of their data following a request. This fee will be based on the administrative costs of providing further copies.

At any point individuals may make a request relating to their data and Constable Country Childcare will provide a response within one month. Constable Country Childcare holds the right to refuse a request, if there is a lawful obligation to retain the data. Constable Country Childcare will inform an individual of the reasons for the rejection of such a request. individuals maintain the right to make a complaint to the Information Commissioner's Office or another supervisory authority; and their ability to seek to enforce their rights through a judicial remedy.

3) The right to rectification:

Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. An individual can make a request for rectification verbally or in writing. Constable Country Childcare have one calendar month to respond to a request. If Constable Country Childcare are satisfied that the personal data is accurate, individuals will be informed that the data will not be amended. The decision will be explained but individuals maintain the right to make a complaint to the Information Commissioner's Office or another supervisory authority; and their ability to seek to enforce their rights through a judicial remedy.

4) The right to erasure:

This is often called the 'right to be forgotten'. Individuals make a verbal or written request for the deletion of their data. Constable Country Childcare holds the right to refuse a request, if there is a lawful obligation to retain the data. Constable Country Childcare will inform an individual of the reasons for the rejection of such a request. Individuals maintain the right to

make a complaint to the Information Commissioner's Office or another supervisory authority; and their ability to seek to enforce their rights through a judicial remedy where they believe there is no legitimate or compelling reason for Constable Country Childcare to use or store data.

Evidently, Constable Country Childcare has a legal obligation to keep children and parental/guardian information for a reasonable period of time (which varies depending on the data and circumstances). Please see further in the 'Retention Periods for Records' document for details of this. All data when stored beyond the date of departure of a child and their respective parent/guardian is archived securely and there will be a Risk Assessment in place for transportation and storage. After a reasonable period of retention, paper copies of information will be shredded and all data will be securely and completely disposed of.

5) The right to restrict processing:

Individuals hold the right object to Constable Country Childcare processing their data (or their child's). This means data can be stored securely as normal but must not be used/processed beyond this.

6) The right to data portability:

Constable Country Childcare occasionally requires data to be moved between settings and IT systems. This can include moving data to Local Authorities and Tapestry' Online Learning Journal. Such recipients use secure file transfer systems and have their own policies and procedures in line with the GDPR.

7) The right to object:

Individuals can object to their data being used for certain activities such as marketing or research. Constable Country Childcare does not pass on information for marketing and research. However, individuals can object to receiving emails regarding marketing of Constable Country Childcare events and activities.

8) The right not to be subject to automated decision-making including profiling:

Constable Country Childcare does not use automated decision and profiling systems.

Storage and use of personal information

All paper copies of children, staff and parent/guardian information are kept in secure locations within our settings. Members of staff have access to such information but information is strictly confidential and (apart from archived information) remains within the settings at all times, unless there is a need to transport the data between settings.

Upon a child leaving a Constable Country Childcare setting and moving on to school or to another setting, data held may be shared with the receiving school/setting.

All Constable Country Childcare staff who process or use any personal information must ensure they follow the GDPR principles at all times. Access to information will only be used to the extent required by the task being undertaken and will be restricted to those persons

recognised by management as requiring such access in the course of their duties and responsibilities. In the event of any breach of information security, it must be reported to management to enable appropriate investigation and a review of the adequacy of existing information security measures when necessary.

Children's information is used in a number of ways. Regular use will be in weekly registers and medical forms, and where necessary may be used in disclosure forms and referrals to external agencies. Such documents may use a child's name, date of birth and, occasionally, address. These documents are shredded after the relevant retention period, and digital data is securely and completely disposed of.

Personal data held visually in photographs or video clips will not be stored unless explicit consent has been obtained from a parent/guardian. Names will never be stored with images on displays or on the website without explicit consent. Such data will not be used in a way that can be accessed by the public (e.g on the website or on adverts) unless explicit consent is given.

All access to Office computers and Tapestry Online Learning Journals are password protected. When members of staff leave Constable Country Childcare completely, relevant passwords will be changed accordingly in line with the GDPR and safeguarding. Portable data (e.g USB memory sticks) are rarely used but if they are they will be password protected and securely stored.

Constable Country Childcare staff will manage and process personal data properly, protect individual rights to privacy under the GDPR and will be transparent and cooperative regarding data access, use and disposal.

If you have any further questions please contact your settings managerial staff or visit the Information Commissioner's Office website <https://ico.org.uk> for details about your rights.

Kind Regards,

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Group Manager

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