



## **Data Protection Policy**

In order to provide a quality early years and childcare service and comply with legislation, Aflah Nursery will need to request information from parents about their child and family. Some of this will be personal data.

Aflah Nursery takes families' privacy seriously, and in accordance with the General Data Protection Regulation (GDPR) Aflah Nursery will process any personal data according to the seven principles below:

1. Aflah Nursery must have a lawful reason for collecting personal data, and must do it in a fair and transparent way. Aflah Nursery will be clear about what data they are collecting, and why.
2. Aflah Nursery must only use the data for the reason it is initially obtained. This means that Aflah Nursery may not use a person's data to market a product or service to them that is unconnected to the reasons for which they shared the data with Aflah Nursery in the first place.
3. Aflah Nursery must not collect any more data than is necessary. Aflah Nursery will only collect the data they need to hold in order to do the job for which Aflah Nursery collected the data.
4. Aflah Nursery will ensure that the data is accurate, and ask parents to check annually and confirm that the data held is still accurate.
5. Aflah Nursery will not keep data any longer than needed. Aflah Nursery must only keep the data for as long as it is needed to complete the tasks it was collected for.
6. Aflah Nursery must protect the personal data. Aflah Nursery will be responsible for ensuring that they and anyone else charged with using the data, processes and stores it securely.
7. Aflah Nursery will be accountable for the data. This means that Aflah Nursery will be able to show how they are complying with the law.

## Procedure

Aflah Nursery has registered with the Information Commissioner's Office, the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Aflah Nursery expects parents to keep private and confidential any sensitive information they may accidentally learn about any staffs' family, or the other children and families attending Aflah Nursery, unless it is a child protection issue.

Aflah Nursery will be asking parents for personal data about themselves and their child/ren in order to deliver a childcare service (see privacy notice). Aflah Nursery is required to hold and use this personal data in order to comply with the statutory framework for the Early Years Foundation Stage, Ofsted, Department for Education and the local authority.

## Subject access

Parents have the right to inspect records about their child at any time. This will be provided without delay and no later than one month after the request, which should be made in writing. Aflah Nursery will ask parents to regularly check that the data is correct and update it where necessary.

## Storage

Aflah Nursery will keep all paper-based records about children and their families securely locked away in a cupboard in the office which also has a lock.

If Aflah Nursery keep records relating to individual children on the office computer, or externally on software being used for the purposes of providing a learning journal to parents, including digital photos or videos, Aflah Nursery will obtain parents' permission. This also includes CCTV. Aflah Nursery will store the information securely, for example, in password-protected files, to prevent viewing of the information by others with access to the computer.

Backup files will be stored on an encrypted memory stick, which will be locked away when not in use. Firewall and virus protection software are in place.

If Aflah Nursery store any records using a digital solution such as Tapestry, Aflah Nursery will ensure that they have carried out due diligence to ensure they are compliant with GDPR.

### Information sharing

Aflah Nursery is expected to share information with other childcare providers if a child also attends another setting;

Aflah Nursery is also required to share information with Oxfordshire County Council in regards to the childcare and early years entitlements.

Aflah Nursery will not share any information with anyone without parental consent, unless there is a child protection concern.

Ofsted may require access to the records at any time.

The Police, in the case of CCTV footage which captures the communal entrances for the safety of all users to the building. The CCTV is operated by the Centre in compliance with the GDPR.

### Record keeping

Aflah Nursery records all accidents in an accident book.

Aflah Nursery will inform Ofsted, the local child protection agency and Health and Safety Executive of any significant injuries, accidents or deaths as soon as possible.

Aflah Nursery records all significant incidents in an incident book and Aflah Nursery will share these with parents so that together we can work to resolve any issues.

Aflah Nursery will only share information if it is in a child's best interests to do so. For example, in a medical emergency Aflah Nursery will share medical information with a healthcare professional. If Aflah Nursery is worried about a child's welfare, they have a duty of care to follow the local safeguarding children board procedures and make a referral. Where possible, Aflah Nursery will discuss concerns with the parents before making a referral.

### Safe disposal of data

Aflah Nursery is required by law to keep some data for some time after a child has left the nursery. Aflah Nursery have a review plan in place and ensure that any data is disposed of appropriately and securely.

### Suspected breach

If Aflah Nursery suspects that data has been accessed unlawfully, Aflah Nursery will inform the relevant parties immediately and report to the Information Commissioner's Office within 72 hours. Aflah Nursery will keep a record of any data breach.

Print Name: Ms. Frazana Aslam

Role: Operations Manager

Date: May 2018

Date of review: May 2019