



## Privacy Notice

Kennford Playbox  
The Kenn Centre  
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The Kennford Playbox data protection officer is (staff) Anna Knapton (manager)  
(Committee) Jessica Lewis (Chairperson)

### Introduction

We 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.

*We record, process and keep personal information about you and your child in accordance with Article 6 of the General Data Protection Regulation (GDPR, May 2018): “the rights of the data subjects”.*

*It is a requirement of our registration with the Information Commissioners Office (ICO)\* to provide you with information about the details we keep about you and your child/ren.*

\*ICO – <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>.

This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

This requirement applies to information I collect in relation to:

- Online data processing
- Paper data processing

We collect personal data about you and your child to provide care and learning that is tailored to meet your child’s individual needs.

## **Your Child's Developmental records might include**

- Information from you
- Details about your child's learning and development at home
- A statutory 2 year old progress check
- Observations of your child's learning (including photographs)
- Assessments, individual planning and regular progress summaries.

## **Personal records including**

- Personal details required by the statutory frameworks and/or the Local Authority for funding purposes
- Contractual details including attendance registers and fees information
- Emergency details including your contact details and records of your child's health and care needs. Safeguarding and child protection records
- Any records required to support your child such as shared information from other agencies and professionals.
- We also collect information in order to verify your eligibility for free childcare as applicable (information is needed to access funding for qualifying 2 year old funding; 15 hours statutory funding; 30 hours funding; Early Years Pupil Premium; Special Educational Needs & Disability Funding – SEND)

## **What information we need about you and your child/ren**

Personal details that we collect about your **child** include:

- your child's name, date of birth, address, health and medical needs, development needs, and any special educational needs (required by the statutory frameworks and/or the Local Authority for funding purposes)
- Contractual details including attendance registers and fees information.
- Emergency details including your contact details
- Safeguarding and child protection records
- Records required to support your child such as shared information from other agencies and professionals (We have a statutory duty to share information with other settings)

Personal details that we collect about **you** (parent/carer) include:

- Your name, home and work address, phone numbers, emergency contact details, and family details. If you apply for up to 30 hours of free childcare, we will also collect: your 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 from information collected during our admissions process and welcome pack - includes admissions form; Council Parent Declaration Form; All About Me (attainment to date); School note of interest; Tapestry Permission; Photo permission etc

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

We hold information about you and your child/ren to allow us to comply with the Early Years Foundation Stage\* (EYFS, 2017) and the Early Years Childcare Register\*\* (2016). Some of the data I process relates to the Early Years Inspection handbook\*\*\* (2016). Most of the information I collect about you and your child is statutory; when information is optional I will let you know that you have a choice whether to share it with me or not.

\*EYFS 2017 –

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/596629/EYFS\\_STATUTORY\\_FRAMEWORK\\_2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf)

\*\*Childcare Register 2016 – see Annex C

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/616082/EY\\_and\\_childcare\\_reg\\_handbook.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616082/EY_and_childcare_reg_handbook.pdf)

\*\*\*Early Years Inspection handbook –

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/596329/Early\\_years\\_inspection\\_handbook.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/596329/Early_years_inspection_handbook.pdf).

### **What do we do with your data**

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
- to support your child's wellbeing and development
- to manage any special educational, health or medical needs of your child whilst at this setting to carry out regular assessment of your child's progress and to identify any areas of concern - We record your child's activities for their individual learning record. This may include photographs and videos. These are shared directly with you through Tapestry – your child's online learning journal.
- to maintain contact with you about your child's progress and respond to any questions you may have
- to process your claim for up to 30 hours free childcare (only where applicable)
- to keep you updated with information about our service

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).

### **Who we share your data with**

We are required to ensure the information we collect about you and your child/ren is treated confidentially and only shared when there is a need for it to be shared, ideally with your permission in advance of sharing.

We are required to share information in order to deliver childcare services with the following categories of recipients:

- Ofsted – during an inspection or following a complaint about our service
- banking services to process chip and pin and/or direct debit payments (as applicable)
- the Local Authority (to access early years funding & childcare support (2 year old funding) (15-hours) (30-hours) (Early Years Pupil Premium) (SEND –special educational needs funding)
- We may share information about income and expenses including, when requested, your invoices and payments with the HMRC and Tax Credits
- the government's eligibility checker (for 2 year olds and 30-hour funding options)
- our insurance underwriter (if applicable)
- our setting software management providers.
  - Tapestry provide our online learning journal provision
  - Sage provide our accounting package.
- the school that your child will be attending
- Early Years Childcare Professionals
  - We are required by the EYFS to share a copy of your child's 2 year progress check with your health visitor.
  - We may need to share information with Early Years Consultants in order to access further help and advise with regards to child attainment or SEND.
  - We may need to share information with HMRC or doctors/consultants in order to help you access Personal Independence Plan Allowances to support SEND and access bespoke medical support
  - We share information with other settings or agencies involved in your child's care – we are required to do this by the EYFS.

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 for their own purposes

### **Ensuring your data is accurate**

Under the GDPR I am required to keep data about you and your child/ren up-to-date and to ensure it is accurate: I will do this regularly. You have the right to access personal data about you and your child/ren and we will share this information with you on request.

### **How do we maintain your records**

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

- Paper records are kept in locked storage. We review records being stored annually and destroy any redundant records as set out in our data retention policy.
- Digital Records are stored on our office computer & backup systems. Our systems & software are accessed by key personnel on a needs basis. Sensitive information is password protected or maintained in hardcopy form only. Digital records kept are regularly reviewed and deleted as per our data retention policy.

### **How long do we retain your data?**

We retain your child's personal data (registration forms) for up to 6 years after your child no longer uses our setting. This information may be required during a financial audit of government funding streams.

Medication records and accident records are kept for longer according to legal requirements.

Your child's learning and development "hard-copy" records are maintained by us and handed to you when your child leaves or shredded when no longer required.

Files held in relation to child/ren and their families on the computer are deleted when no longer required using CCleaner\* from Piriform.

\*CCleaner – <https://www.piriform.com/ccleaner/download>.

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).

### **Automated decision-making**

Children's Tapestry Records are transferred to new their new setting and/or deleted within six months of children leaving the setting. This ensures that we have enough space for new system joiners

Parent's log-ins are deleted as soon as we are confident that they are no longer required (we may keep them on record to meet the needs of younger siblings)

### **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 have 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

The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or <https://ico.org.uk/for-organisations/report-a-breach/>.

OfSTED can be contacted in the followings ways: email – [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk); phone – 0300 123 1231; address – Piccadilly Gate, Store Street, Manchester M1 2WD

### **Online data processing**

Computer and laptop security includes regularly updated antivirus software and secure password protection

**Electronic equipment** – We have computers, laptops, and tablets which are used for business purposes. Information is stored on the computer and accessed through the computer and Dropbox. Personal information is rarely shared through Dropbox. Files are only shared with other personnel on a need to know basis. These permissions are reviewed and updated annually.

**Website:** [www.kennfordplaybox.co.uk](http://www.kennfordplaybox.co.uk). when you visit the setting website Google Analytics collects internet log information and details of visitor behaviour patterns. We do not use this information. Our website contains links to other websites. We cannot be held responsible for links that do not work or the accuracy of the information contained in the websites.

**Email including e-newsletters and e-invoices & reminders** – we use one.com to manage and process our email accounts. We keep a copy of your email address on one.com to allow us to process emails quickly. We do not gather statistics or monitor any information.

**Sage** – we use sage to process our invoices and payments

**Tapestry** – We use tablets to send you information about your child’s day and their attainment. The tablets are passcode enabled and restricted to the Tapestry App use only.

**Mobile Text Messages** – We use a no-camera mobile phone to back up our landline & to send/reply to text messages. We keep a copy of your mobile phone number in our phonebook to allow us to send you information.

**Facebook** – We use Facebook to keep you up to date with our news. The service collects information about user activity and requires visitors who want to comment to enter their name. We do not use this information.

### **Paper data processing**

Paper documents relation to you and your child/ren are stored in a locked office. Your child’s learning journey is retained in the office to be shared with you and your child/ren on request. Termly attendance registers are stored in the register and locked filing cabinet when completed.

### **Paper data includes:**

Your child’s learning and development learning journal

Attendance Registers

Documents for HMRC and Charity Commissioners including invoices

Registration documentation including Emergency Contact Details

Parent – provider Contracts

Permission forms (including those required ahead of any trip out)

Safeguarding files relating to your child’s health and safety

Special Educational Needs and Disability Files

**Local Authority funding forms** – parents who are eligible to claim 15 or 30 hours Government funded childcare are required to complete a Local Authority “Free Early Education Entitlement Parent Declaration Form. This form includes identifiers such as parent names and national insurance numbers and the child’s personal details and characteristics such as ethnic group.

Please see our Data Audit for Full Details.

## Changes to this notice

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

This notice was adopted at a meeting of The Kennford Playbox held on

Date to be Reviewed..... May 2020

Signed on behalf of the management committee.....

Name of Signatory.....Marie Macfarlane

Role of signatory: Kennford Playbox Chairperson.

### Reference:

PLA Draft Privacy Notice dated April 2018

Childcare.co.uk/www.childcare.co.uk – Privacy Notice for Parents.

ICO website – <https://ico.org.uk/> and helpline (0303 123 1113)

Early Years Foundation Stage (DfE, 2017) and related documents

GDPR for the education sector guidance from ICO – <https://ico.org.uk/for-organisations/education/education-gdpr-faqs/>

**About websites used in this guide** – in places this guide might link to other websites. The author and distributor of this guide cannot be held responsible for the content or availability of these sites.

**About Information taken from EYFS statutory documents** – this guide is based on the Early Years Foundation Stage (EYFS, 2017) from [www.foundationyears.org.uk](http://www.foundationyears.org.uk). Information sourced from the Department for Education has been reproduced as per the Open Government Licence for Public Sector Information, which can be viewed on the following website – <http://www.nationalarchives.gov.uk/doc/open-government-licence>. The source of the information is acknowledged as Crown Copyright 2017.