

The Old Railway House Nursery Ltd.

Private Children's Day Nursery

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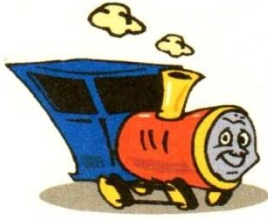
THE GABLES

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Policies and procedures

General Data Protection Regulation (GDPR) Policy Statement

The Old Railway House Nursery Ltd. aims to fulfil its obligations under the General Data Protection Regulation (GDPR).

This policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collecting, processing, using, storing and sharing of personal data.

We have appointed a Data Protection Co-ordinator who reports to the Director (the Director is ultimately responsible for compliance). Our Data Protection Co-ordinator is our Assistant Manager.

Any items relating to GDPR must be referred to the Data Protection Co-ordinator, who will report to the Nursery Manager and/or Director as appropriate.

- We are registered with the Information Commissioners Office (ICO).
- All staff are aware of their responsibilities in collecting, using and sharing data.
- We have a privacy notice that sets out the lawful bases for processing data, the legitimate interests for the processing, individual's rights and the source of the personal data.
- We have a process in place to record any data breaches and a form for reporting breaches to the ICO and any investigations.
- We have a procedure in place for the retention of documents and archiving of them.
- We have an asset register in place to record the different types of information and documentation that we hold, how it is stored, protected and accessed. This is updated regularly.

Procedure

This provision is aware that data protection legislation applies equally to children and staff. Article 5 of the GDPR sets out the principles that we work:

- Data must be processed fairly, lawfully and in a transparent manner.
- Data must only be obtained for specified and lawful purposes.
- Data must be adequate, relevant and not excessive (limited to what is necessary).
- Data must be accurate and up to date.
- Data must not be kept for longer than necessary.
- Data must be securely kept.

We use the GDPR rights for individuals:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision-making and profiling.

The following procedures apply to information held about children:

- Children's records are stored securely. Paper files are locked in cabinets in the nursery office. The nursery office is kept locked. Any electronic files are password protected and only stored where necessary as per our asset register and accompanying documents.
- Computers within nursery are kept secure with appropriate software to ensure maximum protection against ransom and malware which is regularly updated. All data is securely backed up via a USB memory stick that is locked in the office safe.
- Information that is shared (when necessary and only with 'approved' personnel, for example Walsall Early Years Team), is done securely using an email system which complies with GDPR regulations.
- Any documents shared containing sensitive information are password protected.
- A child's records will be disclosed to their parent or carer on submission of a written subject access request.
- Information will be provided within 30 days of the date of the request. If a request is manifestly unfounded or unjustified, and/or repetitive, nursery reserves the right to charge a reasonable fee to comply with requests for excessive amounts, or further copies of information. The fee will be based on the administrative cost of providing the information.

The following procedures apply to information held about staff:

- Staff are able to view the personal data held about them at any time. This applies to all data, whether held on computer or as hard copy. If a staff member requests copies of their data, this request will be fulfilled within 30 days, and is limited to once per year. If additional requests are made, or are repetitive, nursery reserves the right to charge a reasonable fee to comply with requests for excessive amounts, or further copies of information. The fee will be based on the administrative cost of providing the information. Information will be provided within 30 days of the date of the request.
- Members of staff are required to read this information carefully and inform the Nursery Manager, Assistant Manager (Data Protection Co-ordinator) or the Director at the earliest opportunity if they believe that anything is inaccurate or untrue, or if they are dissatisfied with the information in any way.