



**Alexandra Park**  
Children's Learning Community



## **General Data Protection Regulation Policy**

### **Statement GDPR stands for General Data Protection**

GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Alexandra Park Children's Learning Community is dedicated to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors and staff personal data. The Data Protection Act gives individuals the right to know what information is held about them. It gives a framework to ensure that personal information is handled properly.

Alexandra Park Children's Learning Community – MPECC Limited is registered with the ICO (Information Commissioners Office) under registration reference: ZA226310 and has been registered since 9 January 2017. Certificates are on display on the parent's information boards in the corridor.

Our General Data Protection Regulation Officer is: **Susana López**

### **GDPR and its 7 rights for individuals:**

#### **1) The right to be informed:**

Alexandra Park Children's Learning Community is a registered Childcare provider with Ofsted and as so, is required to collect and manage certain data. We need to know parent's names, addresses, telephone numbers, email addresses, date of birth and National Insurance numbers. We need to know children's' full names, addresses, date of birth and Birth Certificate number. For parents claiming the free nursery entitlement we are requested to provide this data to Manchester City Council; this information is sent to the Local Authority via a secure electronic file transfer system.

We are required to collect certain details of visitors to our setting. We need to

know visits names, telephone numbers, addresses and where appropriate company name. This is in relation with our Health and Safety and Safeguarding Policies. Alexandra Park Children's Learning Community uses Cookies on its website to accumulate data for Google Analytics, this data is anonymous.

As an employer Alexandra Park Children's Learning Community is required to hold data on its employees; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID such as passport and driver's license, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to UKCRBs for the processing of DBS checks.

## **2- The right of access :**

Any individual can make a request relating to their data and Alexandra Park Children's Learning Community will need to provide a response (the period is within 1 month). Alexandra Park Children's Learning Community can reject a request, if we have a lawful obligation to keep data i.e. from Ofsted in relation to the EYFS, but we will notify the individual of the reasons for the rejection. The individual will have the right to complain to the ICO in case they are not content with the decision.

## **3) The right to erasure :**

Anyone have the right to ask for the deletion of their data where there is no compelling reason for its continued use. Nevertheless, Alexandra Park Children's Learning Community has a legal duty to retain children and parents details for a reasonable time, Alexandra Park Children's Learning Community keep these records for 3 years after leaving our setting, children's accident and injury records for 19 years, and 22 years for Child Protection records. Staff records must be kept for 6 years after the member of leaves APCLC, before they can be erased. This data is archived securely offsite and shredded after the legal retention period. A Risk Assessment can be in place for transportation and storage.

## **4) The right to restrict processing**

Staff, parents, volunteers and visitors can object to Alexandra Park Children's Learning Community processing their data. This means that records can be stored but must not be used in any way, for example for communications, publicity, reports and educational purposes.

## **5) The right to data portability**

Alexandra Park Children's Learning Community requires data to be transferred from one IT system to another; such as from Alexandra Park Children's Learning Community to the Local Authority, to shared settings and to Tapestry' Online Learning Journal. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

## **6) The right to object**

Staff, parents, volunteers and visitors can object to their data being used for certain activities like research, communications, publicity, reports and educational purposes.

## **7) The right not to be subject to automated decision-making including profiling**

Alexandra Park Children's Learning Community does not use personal data for automated decisions and profiling that are used for marketing based organisations.

### **Procedures for storage and use of personal information**

- 1- All paper copies of children's and staff records are kept in a locked office in Alexandra Park Children's Learning Community and a locked filing cabinet in Directors and managers offices.
- 2- Members of staff can have access to these files but information taken from the files about individual children (Safeguarding) is confidential and apart from archiving, these records remain on same place at all times. After the retention period records are shredded.
- 3- Information about individual children is used in certain documents, such as, referrals to external agencies and disclosure forms, weekly register, Allergy Plan, All About Me Form, Tracking, Starting Points, Baseline, Reports (Summative Assessment), Behaviour Plan, Individual Plan, EAL Plan, EYPP Plan, Transition's forms, medication forms, Accident forms, Incidents forms, Out of Supervision form and Transition to School Passport. These documents include data such as children's names, date of birth and sometimes address.
- 4- These records are shredded after the relevant retention period.
- 5- Alexandra Park Children's Learning Community collect a large amount of personal data; like names and addresses of those on the waiting list. These records are shredded if the child does not attend or added to the child's file

and stored appropriately in Deputy Manager Office.

- 1- Information regarding families' involvement with other agencies is stored in paper format; this information is kept in a locked office and in a locked filing cabinet in the Director's office. Records are shredded after the relevant retention period.
- 2- If a child is leaving Alexandra Park Children's Learning Community and moving on to another setting or moving to a school, data held on the child may be shared with the receiving school.
- 3- Children information will be sent via secure post service or via a secure file transfer system. For children attending school the parent/carer will be given the data to deliver to the receiving school.
- 4- Transition to School: parents/ carers give writing permission to contact future schools and exchange information while visits, telephones calls and emails with teachers.
- 5- Alexandra Park Children's Learning Community ask for written consent via form to store personal data that are obtained visually in photographs or video clips or as sound recordings.
- 6- No names are stored with images in photo albums, displays, on the website or on Alexandra Park Children's Learning Community social media sites without writing permission. No surnames, date of birth, dietary requirement of children and address or telephone numbers of parents/carers should be on public display.
- 7- Access to all Office computers and Tapestry Online Learning Journal is password protected. When a member of staff leaves the company the staff is being deleted from Tapestry and computers that has being used by those staff has their passwords changed in line with this policy and for safeguarding reasons.
- 8- All portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet.
- 9- Visitor's book is kept in Administration Office and not on show to people visiting our centre. Person in Administration Office is in charge in signing in and out visitors. Staff have to sign a consent form to authorize the use of Staff Signing In and Out Book that is placed in the corridor and the Staff Time Sheet in the staff room.

**GDPR means that Alexandra Park Children's Learning Community must;**

- \* Manage and process personal data properly

\* Protect the individual's rights to privacy

\* Provide an individual with access to all personal information held on them

**Obs: Please see attached Preschool Learning Alliance Retention periods for records.**

August 2021

Policy review date: August 2022