

Tywardreath Pre-School Playgroup – Staff, Committee, Students and Volunteers Fair Processing Notice

Tywardreath Pre-School Playgroup takes its General Data Protection Regulation (GDPR) duties seriously and with care. As part of our wish to be transparent and informative, please find information about all the data we may process, store and transfer in relation to our staff, committee, students and volunteers.

Staff Data – Job Application - Application form stored until 6 weeks after job offer accepted for unsuccessful candidates. Application form stored until 7 years after employment end for successful candidates.

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Consent/ Legal Obligation	On job application form	As part of application, for contact	Forms – Securely stored at pre-school	References – to check suitability	6 weeks or 7 years (see above)	
Address	Consent/ Legal Obligation	On job application form	As part of application, for contact	Forms – Securely stored at pre-school		As above	
Email	Consent/ Legal Obligation	On job application form	As part of application, for contact	Forms – Securely stored at pre-school		As above	
Telephone Numbers	Contract	On job application form	As part of application, for contact	Forms – Securely stored at pre-school		As above	
Date of Birth		Formerly on job application form		Forms – Securely stored at pre-school		As above	D.O.B. no longer captured on applications from May 2018
References	Contract	On job application form	As part of application, for contact, suitability checks and interview process	Forms – Securely stored at pre-school		As above	
Signature	Contract	On job application form	As part of contract for application process	Forms – Securely stored at pre-school		As above	

Employment History	Contract	On job application form	As part of application, for suitability checks	Forms – Securely stored at pre-school		As above	
Qualifications	Contract	On job application form	As part of application, for suitability checks	Forms – Securely stored at pre-school		As above	
Criminal Convictions	Contract	On job application form	As part of application, for suitability checks	Forms – Securely stored at pre-school		As above	
Criminal Convictions of others at same address	Contract	On job application form	As part of application, for suitability checks	Forms – Securely stored at pre-school		As above	

Staff, Committee, Students, Volunteers – Enrolment/Staff Profile Form or Work Experience Consent Form– Data from this form is used to; process contracts; in case of emergency; to process payroll (and pay associated details such as HMRC for tax, NI, Nest for Pensions); to draw up rota's; for daily attendance registration; for legal obligations, such as listed below in accordance with Ofsted and UK/EU Employment laws; to book training courses, as agreed by the data subject. Name data will also be made accessible to Ofsted during inspections or on their request.

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Contract/ Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts	On forms, securely stored in pre-school Single Central Record File	As detailed above	7 years after end of employment/ volunteer/ committee role	
Address	Contract/ Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts	On forms, securely stored in pre-school Single Central Record File	As detailed above	As above	
Email	Contract	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts	On forms, securely stored in pre-school Single Central Record File	As detailed above	As above	
Telephone Numbers	Contract	On Enrolment/Staff	As above, to process contracts	On forms, securely stored in pre-	As detailed above	As above	

		Profile form/WE Consent form		school Single Central Record File			
Date of Birth	Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As detailed above	As above	
References	Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	References as part of Suitability checks	As above	
Date Employment/ Placement Commenced	Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As part of UK/EU Employment law	As above	
Disclosure Detail	Legal Obligation	On Enrolment/Staff Profile form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As part of UK/EU Employment law	As above	
Signature	Legal Obligation	On Enrolment/Staff Profile form/WE Consent form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As part of UK/EU Employment law	As above	
Qualifications	Legal Obligation	On Enrolment/Staff Profile form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As part of Ofsted requirements	As above	
DBS Number & Date of Issue	Legal Obligation	On Enrolment/Staff Profile form	As above, to process contracts/legal obligation	On forms, securely stored in pre-school Single Central Record File	As part of Ofsted requirements	As above	

Staff – Payroll Sheet/Payslips Payroll Sheet - Retained for 1 year, sent electronically to Devon PLA Payroll, destroyed, renewed every 12 months. Payslips – One copy given to individual staff member, copy of each payslip retained for 7 years after employment end date.

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Contract	Payroll Sheet	To process wages	On Payroll Sheet forms, sent by post or electronically to payroll annually. Payslips and other payroll details held securely at pre-school managers home office	Devon payroll – To process wages	Payroll sheets – 1 year. Payslips – for 7 years after employment end date	
Date of Birth	Contract	Payroll Sheet	To process wages	As above	As above	As above	
National Insurance Number	Contract	Payroll Sheet	To process wages	As above	As above	As above	
Bank Account Number & Sort Code	Contract	Payroll Sheet	To process wages	As above	As above	As above	

Staff, Committee, Students, Volunteers – DBS Application (Application completed on paper form, emailed to CAPITA, Ofsted and/or DBS processing company and paper copy forms destroyed on receipt of checked DBS).

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Contract and Legal Obligation	DBS Application Form	To process DBS application as part of ongoing Suitability Checks	On DBS application form, securely stored in office at pre-school managers home	CAPITA or other DBS Processing company, as detailed on the form	DBS Application form destroyed by cross shredding after DBS certificate received by holder	

Date of Birth	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
Addresses for last 5 years	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
Email address	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
Telephone Number	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
Signature	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
DBS Application Reference	Contract and Legal Obligation	DBS Application Form	As above	As above	As above	As above	
Passport Number and dates	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Driving Licence Number, date and Country of Issue	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Birth Certificate Issue date	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Marriage Certificate Date	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Verifiers Name	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Verifiers Address	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Verifiers email	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Verifiers Telephone Number	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Verifiers Signature	Contract and Legal Obligation	Identify Checking Form (ICF)	As above	As above	As above	As above	
Full Name	OFSTED Suitability Letter	Suitability Letter Copy Sent by OFSTED	Ofsted Suitability letter	As above		7 Years after employment/ volunteer/	

						committee end date	
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Staff, Committee, Students, Volunteers – DBS Record (DBS details recorded by manager by sight of original copy. DBS returned immediately to owner, DBS details recorded in digital Single Central Record and on Staff Enrolment Form.)

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Contract and Legal Obligation	From Original DBS	To confirm ongoing suitability, In accordance with Ofsted	On digital Single Central Record and on Staff Enrolment Forms	UK Government portability checker	7 Years after employment/ volunteer/ committee end date	
DBS Number	Contract and Legal Obligation	From Original DBS	As above	On digital Single Central Record and on Staff Enrolment Forms	As above	As above	
DBS Issue Date	Contract and Legal Obligation	From Original DBS	As above	On digital Single Central Record and on Staff Enrolment Forms	As above	As above	
Date of Birth	Contract and Legal Obligation	From Original DBS	As above	On digital Single Central Record and on Staff Enrolment Forms	As above	As above	
DBS Issuer	Contract and Legal Obligation	From Original DBS	As above	On digital Single Central Record and on Staff Enrolment Forms		As above	

Staff/Students Health Declaration – By completing the Staff Health Declaration Form, you are consenting to the capture, storage and processing of the data as follows: Students will also provide health details on the Cornwall Schools Work Experience Scheme Placement and Approval Consent Forms

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Full name	Consent	On Health Declaration Form	As part of ongoing suitability checks. In case of emergency	On forms, securely stored in pre-school Single Central Record File	Medical services only in case of an emergency if data subject cannot consent	New form completed annually and old form destroyed by cross shredding	
Doctors	Consent	On Health Declaration Form	As above	As above	As above	As above	
Other Medical Professionals	Consent	On Health Declaration Form	As above	As above	As above	As above	
Health Conditions	Consent	On Health Declaration Form	As above	As above	As above	As above	
Medication	Consent	On Health Declaration Form	As above	As above	As above	As above	
Hospital Admissions	Consent	On Health Declaration Form	As above	As above	As above	As above	
Allergies	Consent	On Health Declaration Form	As above	As above	As above	As above	

Additional documentation that may include the full names of staff, committee, students, volunteers:

- The 'Who's Who' board with details of staff, committee and volunteers names in the porch
- Committee and staff meeting minutes
- Our pre-school prospectus
- Our website
- Our Facebook page and messages sent on Facebook Messenger
- The key group list
- Qualification Certificates displayed on the wall, such as First Aid, Food Safety
- Setting targets and development aims
- Daily register
- Risk Assessments
- Working Together forms

Photographs of staff, committee, students and volunteers

Images (photographs and recordings of image data) maybe captured, stored, process or transferred via one of the official pre-school devices (staff Kindles, managers Blackberry or other photographic devises owned by Tywardreath Pre-School, unless a staff/committee/volunteer member opts out to the pre-school manager in writing.

The data subject (photograph subject) can request to have individual photographs/recordings removed, on request.

Photographs maybe transferred via the following platforms, (but is not limited to), unless specified by the data subject (photograph subject):

- Facebook
- Twitter
- Pinterest
- Yahoo mail
- Pre-School website, hosted by WIX
- Amazon Prime
- Media, such as newspapers, advertising

Tywardreath Pre-School Playgroup is a Joint Data Processor with the following agencies or companies:

Agency or Company	Lawful Basis for Data Collection and Processing	Why Data Captured	How Data Captured	How Data Stored	How Data Transferred	How Long Data is Retained	Notes
Facebook	Contract	To promote the daily life and events of the pre-school	By photos and names on posts, photos and messages	On Facebook	Unlimited as pubic site	Indefinitely	Please see Facebook for their GDPR privacy agreement
Twitter	Contract	To promote the daily life and events of the pre-school	By photos and names on posts, photos and messages	On Facebook	Unlimited as pubic site	Indefinitely	Please see Twitter for their GDPR privacy agreement
Pinterest	Contract	To promote the daily life and events of the pre-school	By photos and names on posts, photos and messages	On Facebook	Unlimited as pubic site	Indefinitely	Please see Pinterest for their GDPR privacy agreement
Pre-School Learning Alliance Devon Payroll	Contract	To process payroll	On digital payroll spreadsheet. On annual payroll details form	Digital payroll spreadsheets are stored on an encrypted external	By email	7 years after employment end date	Please see Pre-School Learning Alliance Devon Payroll for their

				hard drive, kept securely in the pre-school managers home office. Payroll forms sent annually to Devon Payroll by email/post			GDPR privacy agreement
HMRC	Contract and Legal Obligation	To process pay related payments	On payslips and payroll processing paperwork	In payroll file kept securely in the pre-school managers home office.	Through the HMRC Website	7 years after employment end date	Please see HMRC for their GDPR privacy agreement
Nest	Contract	To process pension	On payslips and payroll processing paperwork	Kept securely in the pre-school managers home office	Through the NEST Website	7 years after employment end date	Please see Nest for their GDPR privacy agreement
RIDDOR (Reporting of Injuries, Diseases, Dangerous Occurrences Regulations)	Consent and Legal Obligation	Legal Obligation on a notable accident or incident	On pre-school accident/incident form. RIDDOR also have their own forms	Forms – Securely stored at pre-school	In the case of a notifiable incident or accident at pre-school we must contact RIDDOR by law	Indefinitely or up to three years after the date of the record	Please see RIDDOR for their GDPR privacy agreement
Tapestry	Contract	To set up a keyperson account and to record observations and photos as part of the EYFS Curriculum, as outlined by Ofsted	To make a staff profile to enable observations and photos to be added		Data entered into Tapestry to allow staff to have their own accounts to access and record observations and photos for their key children	Until 6 weeks after employment end date	Please see Tapestry for their GDPR privacy agreement
Amazon	Consent	We store photos on Amazon Prime, via the pre-school Kindles, which are only used by pre-	Photos taken on staff held pre-school Amazon Kindles and stored on the internal	Kindles internal memory and Amazon Prime for additional storage	From Amazon prime storage to Tapestry	Until data subject (photo subject) request for them to be deleted	Please see Amazon for their GDPR privacy agreement.

		school staff. Some photos may contain staff members image	memory and on external memory on Amazon Prime				All our staff Kindles are password protected and encrypted
Yahoo (Oath)	Contract	Yahoo is our email provider for our two email accounts. We email through Yahoo and process email addresses and names through email	Email addresses and email holders name is stored in our Yahoo contacts	In Yahoo contacts	Via emails between us and data subject (email address holder)	We retain email addresses on our Yahoo account for legitimate interest reasons, for up to 4 years	Link to Oath GDPR data details: https://www.oath.com/en-gb/my-data/#startingwithdata
UK Government	Contract	Checking ongoing suitability of adults using GOV.uk DBS portability Checker	From staff enrolment forms	It is entered into the GOV.uk portal page, search details maybe stored by their capture systems			Please see GOV.uk DBS for their GDPR privacy agreement
Quickbooks	Contract	To process accounts and create invoices	Staff / volunteer / committee data not processed on Quickbooks	On Quickbooks servers			Please see Quickbooks for their GDPR privacy agreement
WIX	Consent	To provide information for public with regards to the staff/ committee and volunteers	Verbal permission sought from each individual	On WIX website host servers	On WIX host server	Until data subject asks for data to be removed	Please see WIX for their GDPR privacy agreement
Peter Williams Accountants	Legal Obligation	To audit annual accounts	All accounting documentation is submitted for audit	Annual accounts securely stored at pre-school after audit		6 years	Please see Peter Williams Accountants for their GDPR privacy agreement

Training Providers – By verbal agreement of a training enquiry or a training booking, you consent to your data being transferred to the following data processors:

Agency or Company	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Virtual College	Consent		For course enquiry, booking, attendance or certification	By Virtual College	Training provider	By pre-school Until 2 weeks after course attended. For training provider, please see their GDPR	Please see Virtual College for their GDPR privacy agreement
Educare/ Pre-School Learning Alliance Training	Consent		As above	By Educare/PLA	As above	As above	Please see Educare/PLA for their GDPR privacy agreement
Cornwall Council Training Department	Consent		As above	By Cornwall Council Training Team	As above	As above	Please see Cornwall Council Training for their GDPR privacy agreement
Other Third Party Trainers, e.g. First Aid, PLA	Consent		As above	By training provider as specified	As above	As above	Please see training company for their GDPR privacy agreement

Education Settings for work experience and college students – By requesting a placement at our pre-school, you consent to your data being processed as a joint processor between Tywardreath Pre-School Playgroup and your school or college.

School or College	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
Your secondary School or FE college or HE university	Consent	On joint processing forms, such as placement confirmation and consent forms	For course enquiry, booking, attendance or certification	By us and your education provider.		7 years after placement finishes	Please see your own setting for their GDPR privacy agreement

Tywardreath Pre-School Playgroup is a joint Data Processor with the following agencies or companies using data of management staff/committee for a point of contact, (contact data such as name, email, address, telephone number):

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to and Why	How Long Data is Retained	Notes
St Austell Brewery	Contract	Trustees names and contact data details are captured on the lease and rental agreement and solicitors documentation	As part of our contract with St Austell Brewery	On paper copy of lease and in pre-school business plan	Solicitor	Until 7 years after lease end	
Utilities Companies	Contract	Managers contact data given to utilities companies, such as, but not limited to BT, Scottish Power,	As a point of contact for utilities contracts	On utilities data software, on paper and electronic billing and invoicing		Until 7 years after contract end	
Lloyds Bank	Contract	Bank account holders personal data given to Lloyds bank as part of account requirements	As part of contract with Lloyds Bank	Held with Lloyds bank, on paper and electronic statements and associated paperwork		Until 7 years after contract end	
Government Childcare Voucher Scheme	Contract	Finance managers contact data given as part of contract	As a point of contact as part of contract	By voucher scheme and on associated paperwork		Until 12 months after vouchers end	
Cool Milk	Contract	Managers contact data given as part of contract	As a point of contact as part of contract	Held on Cool Milk's system		See Cool Milk's GDPR notice for further details	
Edenred	Contract	Managers contact data given as part of contract	As a point of contact as part of contract	Held on Edenred's system		See Edenred's GDPR notice for further details	

Compushare	Contract	Managers contact data given as part of contract	As a point of contact as part of contract	Held on Compushare's system		See Compushare's GDPR notice for further details	
Sodexo	Contract	Managers contact data given as part of contract	As a point of contact as part of contract	Held on Sodexo's system		See Sodexo's GDPR notice for further details	

What are the lawful basis for processing?

The lawful basis for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data, which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)