

## Tywardreath Pre-School Playgroup – Children and Families Fair Processing Notice

Tywardreath Pre-School Playgroup takes its General Data Protection Regulation 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 pre-school children and their families.

**Children – Enrolment Forms and Funding Forms:** By completing an enrolment form or signing a funding form, which details the below data, you are entering into a contract with Tywardreath Pre-School Playgroup.

Details from the enrolment forms are used for the following: In case of medical emergency; to provide care; to contact parents/carers/emergency contacts; to create, record and store developmental records; to process invoices and payments; to apply for children’s funding; to complete Special Educational Needs records; to complete Child Protection documents; to complete accident or incident forms; to send pre-school information that maybe of interest such as newsletters, events, promotions by pre-school, but data (details) are not shared with third parties.

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	Enrolment form & Funding Form	To provide care and as part of a contract between pre-school/ Cornwall Council Funding and parents/carers, as detailed above	Forms – Securely stored at pre-school	Joint processors, please see information below	Retained for three years or until after the Ofsted inspection after the child has left pre-school	
Home Address	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
Date of Birth	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
Doctor	Contract	Enrolment form	As above	As above	As above	As above	
Date of last tetanus	Contract	Enrolment form	As above	As above	As above	As above	
Health/Medical Details	Contract	Enrolment form	As above	As above	As above	As above	
Additional Needs or Disabilities	Contract	Enrolment form	As above	As above	As above	As above	
Languages Spoken at Home	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	

<b>Ethnicity</b>	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
<b>Religious Beliefs</b>	Contract	Enrolment Form	As above	As above	As above	As above	
<b>Allergies</b>	Contract	Enrolment form	As above	As above	As above	As above	
<b>Dietary Requirements</b>	Contract	Enrolment form	As above	As above	As above	As above	
<b>Individual Parents Address</b>	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
<b>Individual Parents Phone Numbers</b>	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
<b>Individual Parents email address</b>	Contract	Enrolment form & Funding Form	As above	As above	As above	As above	
<b>Emergency Contact Name</b>	Contract	Enrolment form	As above	As above	As above	As above	
<b>Emergency Contact Address</b>	Contract	Enrolment form	As above	As above	As above	As above	
<b>Emergency Contact Telephone</b>	Contract	Enrolment form	As above	As above	As above	As above	
<b>Professionals Working with Child</b>	Contract	Enrolment form/ Getting to Know me form	As above	As above	As above	As above	
<b>Parents National Insurance Number</b>	Contract	On Funding Form if 30 hours funded only	As above	As above	As above	As above	

**Children's Names** – As part of our daily routines at pre-school sometimes it is in the best interests of the children's education and development to display their names inside the pre-school building. Displaying children's names, at the discretion of pre-school staff, this may include, but is not limited to:

- Children's coat and bag pegs
- On children's work on wall displays
- On the key person list
- On the target white board in the kitchen
- The daily register (only accessed by staff)
- Thank you cards and Christmas cards

## Children – Additional Information

Photographs and video recordings can only be made with the signed consent of the child's parent/carer. There are two different requests for consent, one for taking and storing images (photographs or video recordings) for the use of observations and a second further consent for sharing images on social media or media.

The data subject (photograph subjects parent or carer) can ask to have individual photographs/recordings deleted, on request.

Photographs maybe transferred via the following platforms and any others deemed as suitable by the pre-school management, unless specified by the data subject (photograph subjects parents/carers):

- Facebook
- Twitter6
- Pinterest
- Yahoo mail
- Pre-School website, hosted by WIX
- Amazon Prime
- Media, such as newspapers, advertising

Observations to record and track a child's developmental progress through the early years Foundation Stage (EYFS) can only be made with the signed consent of the child's parent/carer. Further written consent is needed to process these written and photograph/video recordings on Tapestry Online Learning Journey System. EYFS Observations and Tracking are shared as part of our transition process for children who attend other child care settings or will be transferring to another child care setting or education setting.

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
<b>Images (Photographs and video recordings)</b>	Consent	On pre-school owned staff held Kindles, the pre-school Managers Blackberry or on other image recording devises owned by pre-school	To observe, track and monitor the progress of children through the Early years Foundation Stage.  To promote and share the daily activities and	Images taken on staff held pre-school Amazon Kindles and stored on the internal memory and on external memory on Amazon Prime.  Images stored on managers	Amazon Prime  Tapestry (with consent of data subjects parent/carer)	Until data subject (photo subject parent/carer) request for them to de deleted	

			events of the pre-school.	encrypted Blackberry.  Images backed up to pre-school encrypted laptop or encrypted external hard drive			
<b>Social Media Photos</b>	Consent	As above	To promote and share the daily activities and events of the pre-school.	On Facebook, Twitter, Pinterest or other social media or media sites	Facebook, Twitter, Pinterest or other social media or media sites	Indefinitely	
<b>EYFS Observations</b>	Consent	On Tapestry online learning Journal.  On paper observation sheets.  On sharing sheets	To observe, track and monitor the progress of children through the Early years Foundation Stage.	On Tapestry online learning Journal.  On paper observation sheets.  On sharing sheets	Shared with other or future childcare or education settings  Shared with Ofsted as part of inspection process	Retained for three years or until after the Ofsted inspection after the child has left pre-school.  Until the child reaches the age of 21 or 24 for child protection, SEND records and Health Care Plans	
<b>EYFS Tracking</b>	Consent		To observe, track and monitor the progress of children through the Early years Foundation Stage.	On Tapestry online learning Journal.  On paper observation sheets.  On sharing sheets	Shared with other or future childcare or education settings  Shared with Ofsted as part of inspection process	Retained for three years or until after the Ofsted inspection after the child has left pre-school.  Until the child reaches the age of 21 or 24 for child	

						protection, SEND records and Health Care Plans	
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### Children – Health and Safety

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
<b>Accident Records</b>	Legal Obligation	On accident forms	As part of Health and Safety legislation	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	
<b>Incident Records</b>	Legal Obligation	On incident forms	As part of Health and Safety legislation	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	

**Children – External Agency Data:** If the support of external agencies (such as the speech and language referral team, SENCO, Early Years Inclusion Team) is sought, an external agency form will be filled out by pre-school, in conjunction with the child’s parents/carers and signed by both parties. The completion of these forms will be considered consent to capture, store, process and transfer data.

In the case of a Safeguarding Issue where the child could be endangered by gaining consent from parents/carers, data from pre-school forms will be used to process a referral under the Safeguarding Regulations, without consent.

What Data	Lawful Basis for Data Collection and Processing	How Data Captured	Why Data Captured	How Data Stored	Who Data May be Transferred to, How and Why	How Long Data is Retained	Notes
<b>Full name</b>	Consent or legal Obligation	On external agency forms	For referral process	Forms – Securely stored at pre-school	Externals agencies, such as those listed above, using	Until the child reaches the age of 21 or 24 for child protection, SEND	

					agencies transfer methods	records and Health Care Plans	
<b>Home Address</b>	Consent or legal Obligation	As above	As above	As above	As above	As above	
<b>Date of Birth</b>	Consent or legal Obligation	As above	As above	As above	As above	As above	
<b>Early Years Help Hub Referral</b>	Consent	As above	As above	As above	As above	As above	
<b>Safeguarding Referral</b>	Consent or legal Obligation	As above	As above	As above	As above	As above	

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

<b>Agency or Company</b>	<b>Lawful Basis for Data Collection and Processing</b>	<b>Why Data Captured</b>	<b>How Data Captured</b>	<b>How Data Stored</b>	<b>How Data Transferred</b>	<b>How Long Data is Retained</b>	<b>Notes</b>
<b>Cornwall Council Funding team</b>	Contract	To Process 2 year or 3 year old funding	On Cornwall Councils funding forms	Forms – Securely stored at pre-school	On the Cornwall Council secure online portal	Retained for three years or until after the Ofsted inspection after the child has left pre-school	Please see the Cornwall Council Nursery Funding Department for their GDPR privacy agreement
<b>Early Years Help Hub</b>	Consent	To refer a child or family for additional services such as Speech and Language Therapy	On Cornwall Councils Early Help Hub forms	Forms – Securely stored at pre-school	By email in a password protected document	Until the child reaches the age of 21 or 24 for child protection, SEND records and Health Care Plans	Please see the Cornwall Council Early Help Hub for their GDPR privacy agreement
<b>Children’s Safeguarding Board (CIOS Safeguarding)</b>	Consent or legal Obligation	Legal Obligation to refer a child or family where there are concerns around safeguarding	On CIOS Safeguarding forms	Forms – Securely stored at pre-school	By encrypted link through the CIOS Safeguarding website	Until the child reaches the age of 21 or 24 for child protection, SEND records	Please see CIOS Safeguarding for their GDPR privacy agreement

						and Health Care Plans	
<b>RIDDOR (Reporting of Injuries, Diseases, Dangerous Occurrences Regulations)</b>	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
<b>Tapestry</b>	Consent	To set up a child and parent/carer account and to record observations and photos as part of the EYFS Curriculum, as outlined by Ofsted	From Consent forms  Parent/Carers accounts set up through separate privacy agreement and consent form	Forms – Securely stored at pre-school	Data entered into the tapestry system to allow us to record and track children's progress through the EYFS and for parents/carers to have their own accounts to access their child's observations and photos.  Tapestry accounts transferred to future childcare providers or schools with consent of parents/carers	Until 60 days after child has left pre-school	Please see Tapestry for their GDPR privacy agreement
<b>Amazon</b>	Consent	We store individual children's photos on Amazon Prime, via the pre-school	Photos taken on staff held pre-school Amazon Kindles and stored on the internal memory and on			Until data subject (photo subject parent/carer) request for them to be deleted	Please see Amazon for their GDPR privacy agreement

		Kindles, which are only used by pre-school staff	external memory on Amazon Prime				
<b>Yahoo (Oath)</b>	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	By email	We retain email addresses on our Yahoo account for legitimate interest reasons, for up to four years	<a href="https://www.oath.com/en-gb/my-data/#startingwithdata">https://www.oath.com/en-gb/my-data/#startingwithdata</a>
<b>Facebook Messenger</b>	Legitimate Interest	We may contact Facebook users who engage in our Facebook page or activities using messenger as a way of contact	Through Facebook	On our Facebook pre-school or tree-school page account or messenger	On our Facebook pre-school or tree-school page account or messenger	We retain Facebook Messages for legitimate interest reasons, for up to three years	Please see Facebook for their GDPR privacy agreement

**Social Media Joint Processors** – We use the following social media platforms. We only share photos with consent from parents/carers. We never label photos with children’s names or add comments with children’s names. Any family (not parents or carers) or friends who comments and adds the child’s name or any other data detail cannot be controlled by us and is not our responsibility. However, we will delete such data as soon as possible after we see it (with the exception of data added by parents/carers at their own discretion).

<b>Agency or Company</b>	<b>Lawful Basis for Data Collection and Processing</b>	<b>Why Data Captured</b>	<b>How Data Captured</b>	<b>How Data Stored</b>	<b>How Data Transferred</b>	<b>How Long Data is Retained</b>	<b>Notes</b>
<b>Facebook</b>	Consent	To promote the daily life and events of the pre-school	Photos/video recordings	On Facebook	Unlimited, as public accessible site	Indefinitely	Please see Facebook for their GDPR privacy agreement



<b>Twitter</b>	Consent	To promote the daily life and events of the pre-school	Photos	On Twitter	Unlimited, as public accessible site	Indefinitely	Please see Twitter for their GDPR privacy agreement
<b>Pinterest</b>	Consent	To promote the daily life and events of the pre-school	Photos	On Pinterest	Unlimited, as public accessible site	Indefinitely	Please see Pinterest for their GDPR privacy agreement

## 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.)