



## Heart of Worcestershire College Privacy Notice

### Nursery Parents and Carers

Date May 2018

#### **Who is the Data controller?**

Heart of Worcestershire College

Address: Osprey House, Albert Street Redditch B97 4DE.

Web: [www.howcollege.ac.uk](http://www.howcollege.ac.uk)

Email: [dataprotection@howcollege.ac.uk](mailto:dataprotection@howcollege.ac.uk)

#### **What personal information does the organisation collect and what lawful reasons do we have to collect and process it?**

<b>Type of data</b>	<b>What lawful reason do we have to collect and process it?</b>
Personal details of parents/carers and of children, including name, DOB, religion	Most of this information is required to carry out our contract and within our legitimate interests. Special Category data such as religion is provided by consent, but helps us to plan (for example around religious holidays), and to provide a better service.
Contact details of Parents/Carers including home and work details	This is required in order to carry out our contract and within our legitimate interests. Emergency contact details are required for vital interest reasons.
Medical records of children, including history, allergies, dietary requirements, physical injuries, medication required and administered, health care contacts, any details necessary for safeguarding	These are required to carry out our public task, for legal reasons, for vital interest reasons, and some of the data, such as physical injuries, is required as a legal obligation to protect the child
Details of others who may collect the child – name and relationship, and of other members of the household	We collect this for legal and vital interest reasons to protect the child
Images – photos, videos	We store a photo of the child for administrative reasons, in order to better carry out our public task and for our legitimate interests. Images of parents or children will not be published without consent. Photos or videos will be taken to provide parents/carers with the information about their children. These images will be deleted at the end of the academic year.
National Insurance Number	This is only collected where it is required to claim government payments.
Progress records	These are required to carry out our public task, for legal reasons to monitor progress and to identify potential problems that need to be reported to public agencies. It is also needed for statutory progress checks.

#### **Why do we collect personal information?**

HoW College is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We use data to:

We use personal data of children and of parents/carers in order to carry out administration, and day-to-day business needs, and for security reasons.

HoW College needs to process data so we can provide the children with the highest possible standards of care and education, and in order to administer the business

We maintain detailed records of childrens' progress in order to inform parents/carers, and to meet legal requirements

To collect payments from the government

We gather detailed medical information and other information about the childrens' health and well-being in order to meet legal requirements around health and safety and in order to comply with the law around safeguarding.

Photos will be used for security purposes and to help administer the nursery. Images and videos may be shared with parents/carers, if they choose.

Images and videos may be used for marketing purposes, but only with the permission of the parents/carers.

Details of other members of the household may be required for security and safeguarding reasons, for example to ensure that the child is collected by someone with permission to do so.

### **Special Category Data and Convictions**

Under GDPR, certain types of data are termed "special category". These include ethnicity, medical conditions and disabilities and religion. In addition, we need the data to carry out our obligations under social protection laws (GDPR article 9b) and where it is necessary for reasons of substantial public interest (GDPR article 9g), particularly safeguarding and health and safety. Where these reasons do not apply, we would seek your consent to collect and process the information. For example, we request details of religion, with consent, in order to better plan for religious holidays and to support the child in the best way we are able.

### **Where do we obtain your personal data?**

Most of the information is collected from parents and carers via either paper or online forms. However information may be obtained from other agencies such as social services, previous childcare providers or doctor's surgeries for safeguarding and health reasons

### **How and where do we store data?**

Data will be stored in a range of different places, including the nursery secure database system, on paper, stored in secure places, or on electronic documents within a secure network.

### **Who has access to data?**

Your information may be shared internally, including with any HoW staff who need the data to provide services to the child. This will include special categories of data where appropriate.

Where HoW College engages non-statutory third parties to process personal data on its behalf, we require them to do so on the basis of written instructions, under a duty of confidentiality and they are obliged to implement appropriate technical and organisational measures to ensure the security of data in keeping with GDPR. Such third parties might include debt collectors, or software providers.

We pass information about children to the next childcare provider or school.

We share data with government agencies such as social services or doctors in order to meet our legal obligations, and to protect the health and safety of children.

### **Do we process data outside the EEA?**

HoW College will not transfer your data to countries outside the European Economic Area.

### **How does the organisation protect data?**

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. The Data Protection policy is available to view on our website, or can be obtained in a paper version by contacting our reception.

### **For how long does the organisation keep data?**

All data collected and processed will be deleted within a fixed period of time after the child has left the nursery. Details are available in our data retention policy on the website. However, some data will be kept for longer for legal reasons (e.g. safeguarding data or accident records). Any data provided by consent may be deleted on request. Details are available on the website, or from the nursery manager.

### **What rights do you have?**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the stated purposes of processing
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the data protection officer at [dataprotection@howcollege.ac.uk](mailto:dataprotection@howcollege.ac.uk) or contact the college reception

### **Who can I complain to?**

If you believe that HoW College has not complied with your data protection rights, please contact the Data Protection Officer in the first instance. If you are unhappy with the response, you have the right to contact the Information Commissioner by going to their website ([ico.org.uk](http://ico.org.uk)) or by ringing 0303 123 1113

### **What if I do not provide personal data?**

Failure to provide data required to meet lawful obligations (except where consent is required) will result in us not being able to accept your child in the nursery.

### **Does HoW College use automated decision-making?**

No decisions are not based solely on automated decision-making.

### **Glossary of Acronyms**

GDPR – General Data Processing Regulations

**Data Sharing Agreements**

The college will share data with government agencies such as social services, as required by law. We will provide links to their privacy notices on request.