



General Data Protection Regulation – Privacy Policy

This policy was adopted at a meeting of:

Holy Corner Community Playgroup

On (*date*) 29/05/2024

Signed: Louise Gourmelen
Jenny Elder
Naomi Sumner-Kalkun

Designation: Playgroup Manager
Chair
Business and Development Manager

Statement of Purpose

The term parents/carers will be used to include all main caregivers. The term HCCP will be used in reference to Holy Corner Community Playgroup.

Holy Corner Community Playgroup (HCCP) is required to gather specific personal data and information in order to comply with legislation relating to early learning and childcare in Scotland.

HCCP will gather and process all personal data and relevant consents; verbal or written, following GDPR guidance. Data will be treated confidentially and will uphold the rights of all individuals involved in the service, children, parents/carers, staff, students and volunteers.

HCCP are required to hold information about the children and families using the service as well as staff working within the setting, ensuring compliance within the regulation. Processes will be in place to ensure the safe and secure storage of all data belonging to our service users.

[General Data Protection Regulation \(GDPR\)](#) came into effect on 25 May 2018 and expands on the current regime established by the Data Protection Act 1998 (DPA).

HCCP Privacy Policy

Who we are

HCCP gathers and processes your personal information in accordance with this privacy policy and in compliance with the relevant data protection Regulation and law. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

Our designated Data Protection Officer for the organisation is Naomi Sumner-Kalkun and can be contacted at admin@holycornerplaygroup.org. She is responsible for ensuring systems are in place to process and handle all data appropriately, updating policies, undertaking an annual audit of data and monitoring staff regarding data handling and processing.

The personal data that we collect from you may include:-

* Name

* Gender

- * Date of Birth
- * Home Address
- * Personal Email
- * Business Email
- * Home and or Mobile Telephone Number
- * Information and observations to support your child's learning
- * Medical information
- * Additional Support Needs

Please note, this is not an exhaustive list and we may collect other data from you if relevant.

We collect information in the following ways:-

- * On-line forms
- * Written forms
- * In person
- * Over the phone
- * By e-mail

Information that we collect

HCCP processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

How we use your personal data

HCCP takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with communications such as newsletters and fundraising information etc, you are free to withdraw consent at any time. In line with our Communications Policy, we notify service users by email of essential service updates (including rota duty) or service disruption and we will need confirmation of the method of contacting you individually in the case where you might have withdrawn your consent to be included on the parent/ carer contact list.

The purposes and reasons for processing your personal data are detailed below:-

- * We collect your personal data to support a contract or a service requested by you.
- * We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.

Your rights

You have the right to access any personal information that HCCP processes about you and to request information about: –

- * What personal data we hold about you
- * The purposes of the processing
- * The categories of personal data concerned
- * The recipients to whom the personal data has/will be disclosed
- * We intend to store your personal data for the duration of our contract/service with you and will operate within existing legal requirements
- * If applicable, where we gathered any supplementary information

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will endeavour to make the corrections as a matter of urgency. If there is a valid reason for not doing this, we will contact you and update you about this situation.

You also have the right to request the deletion of your personal data or to restrict processing in accordance with General Data Protection Regulation, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use. This relates to required communications in relation to the service we provide to you.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Sharing and disclosing your personal information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. The processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, which we have agreement of. They have agreed to adhere to the data protection laws and work within the

requirements of required confidentiality and security measures. Regulatory requirements from governing bodies supersede the requirements of the regulation; where a request is made by a non-regulatory organisation, your consent will be requested.

We are required to share information without consent if:

- There is evidence that a child is suffering or at risk of suffering significant harm
- There is reasonable cause to suspect that a child may be suffering or at risk of suffering significant harm
- It will prevent a crime being committed or provide information where a crime may have been committed
- Refusing to share the information will have a negative outcome

Consequences of not providing your data

You are not obligated to provide your personal information to HCCP where it does not relate directly to our service to you, however, if this information is required for us to provide you with our services it may have a direct impact upon the level of service we can provide you with.

How long we keep your data

HCCP only ever retains personal information for as long as is necessary, for the duration of our contract/service with you. Where you have consented to us using your details for direct emails, we will keep such data until you notify us otherwise and/or withdraw your consent. Regulatory requirements from governing bodies supersede the requirements of the regulation.

Fundraising

HCCP would like to contact future, present and past families with details of relevant services and information (including fundraising events). If you consent to us using your contact details for these purposes, you have the right to modify or withdraw your consent at any time by contacting HCCP directly.

Security

We will always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical

and electronic security safeguards.

Links from our site

Our website may contain links to other websites.

Please note that we have no control of websites outside our domain (holycorner.org). If you provide information to a website to which we link, we are not responsible for its protection and privacy.

We would advise you to read any such site's data protection and privacy policies fully to ensure your own security.

Lodging a complaint

HCCP only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Information Commissioner's Office

The Information Commissioner's Office – Scotland
45 Melville Street
Edinburgh
EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

The Information Commissioner's Office (ICO) provides a comprehensive guide to working within GDPR <https://ico.org.uk/>

Additional information to support confidentiality

Records and Storage of Records

To ensure the smooth running of the setting we keep a variety of records including health and safety records, financial records, employment records of staff, students and volunteers and development plans.

We also keep records of the children including:

- Personal Records
- Developmental Records

Personal Records will record information including registration and consent forms, contact information, correspondence from other agencies regarding the child and or family, health issues and any other, relevant, confidential information. These records will be stored securely in a lockable cabinet. Parents will have access only to their own child's file.

Developmental Records may include samples of the children's work, photographs, observations of the child's progress in the setting and any other relevant information pertaining to the child's progress. These records are usually kept within the playroom and can be accessed and contributed to by children, staff and parents. Parents will only have access to their own child's records.

All information regarding children and /or their families will be accurate and up to date and shared only with the appropriate personnel. Each child's personal records concerning information relating to medical matters, child protection matters, additional support needs will be retained for a ten year period and safely disposed of by shredding, pulping or burning. In collecting, holding and processing personal data the setting complies with current Data Protection rules and guidance.

Staff Records

All issues regarding the employment and management of staff are confidential to the people directly involved i.e. the staff member and those involved in making the decisions. Staff will have their own personal record containing relevant information and they will have access only to their own personal record. Records will be kept securely by the person specified by the employer as having access to the personnel files. In committee managed settings these names will need to be reviewed regularly, at least annually, and any changes recorded as appropriate. Records will be disposed of by burning, shredding or pulping and will be kept no longer than necessary. This may be changed on advice from your local authority. Records should be regularly reviewed and information no longer required should be deleted.

Any personal information regarding a member of staff will not be passed to another person without their prior knowledge and consent. Information regarding an individual's performance will be confidential as will any disciplinary or grievance matters in which they are directly involved.

Data breaches

You should make sure that you have the right procedures in place to detect, report and investigate a personal data breach. Any breach of the procedures will be investigated and will result in disciplinary action being taken if involving a staff member. In a committee managed service any breach of the procedures will

result in a complaint being raised against them. Any data breach must be reported to the ICO within 24 hours.

Monitoring of this Policy

It will be the responsibility of the Playgroup Manager of Holy Corner Community Playgroup to ensure that all staff, including new or temporary staff, are familiar with this policy and to monitor that it is being implemented. Parents should be made aware of this policy through the *Parent/Carer Handbook* and the enrolment procedure.

The policy will be reviewed annually to ensure all records are relevant and up to date.