



Confidentiality, Privacy and Data Protection Policy

This policy considers the GDPR (General Data Protection Regulation) 2018

All staff, students and outside agencies are made aware of our confidentiality policy and are required to respect it. We will respect confidentiality in the following ways:

- Children's developmental records are kept within groups as staff need to access them regularly. Any information in a child's record that is of a sensitive nature is kept in a locked cabinet.
- Parents will only have access to the files and records of their own children. Parents have the same rights as their children to privacy and confidentiality in relation to their own data. This includes telephone numbers and email addresses unless permission has been given to share that information, specifically with the class group.
- Parental permission will be sought before any information is disclosed (e.g. telephone numbers and email addresses) except for safeguarding reasons.
- Individual children are not discussed, other than for purposes of curriculum planning, with people other than their parents/carers unless permission has been given. Any concerns/evidence relating to a child's personal safety are kept in a secure confidential file and are shared with as few people as possible on a "need to know" basis.
- Issues to do with the employment of staff, whether paid or unpaid, will remain confidential to the people directly involved with making personnel decisions.
- We will ensure that all staff, volunteers and students are aware that information regarding children, parents and staff is confidential and only for use within the setting; however, duty of care to the child may override the duty of confidentiality, and in such cases, we will pass appropriate information to other organisations. If staff breach any confidentiality provisions, this may result in disciplinary action and, in serious cases, dismissal.
- All new parents are asked to sign the nursery's Privacy Notice when registering their child.
- All new staff are asked to sign the nursery's Privacy Notice when they join the staff team.
- All existing parents and staff were asked to sign the nursery's Privacy Notice in May 2018 when the GDPR came into force.
- All staff receive training in GDPR which is renewed every 3 years.

Please refer to the nursery's Privacy Notice

Holland Park Prep-Prep and Nursery holds information on pupils and staff to run the care and education system to a very high standard in accordance with the specific needs of every child, and in doing so have to follow the Data Protection Act 1998, Freedom of Information Act 2000 and General Data Protection Regulation 2018. This means, among other things, that the data held about pupils is kept securely and must only be used for specific purposes allowed by law. We therefore wish to inform all parents and staff about the types of data held, and to whom it may be passed.

We hold information on pupils to support their teaching and learning, to monitor and report on their progress, to provide appropriate care and to assess how good the provision of care and education is. This information includes contact details, attendance information and characteristics such as ethnic group, special educational needs, and any other relevant information such as personal observations. There are strict controls over to whom this information may be passed.

Pupils, as data subjects, have certain rights under the Data Protection Act, including a general right of access to personal data held on them, with parents exercising this right on their behalf as they are too young to do so themselves. If a parent wishes to access the personal data held about their child, this can be done through a subject access request. This is a formal procedure, which is started in the first instance by contacting the Operations Manager.

We also hold information on staff in order to provide the most appropriate care for the children according to the training and experience of staff and to provide a high standard of care and support to each member of our staff team. This information includes personal details, family, health, education, training and employment details, financial details and details on racial or ethnic origin and religious belief. There are strict controls over to whom this information may be passed. Staff, as data subjects, have the right under the Data Protection Act, including a general right of access to personal data held on them. If they wish to access the personal data held about themselves, this can be done through a subject access request. This is a formal procedure which is started in the first instance by contacting the Operations Manager.

From time to time we take photographs of the children to be displayed either on the premises or on our website (specific parental permission is needed for this).

We have CCTV cameras. We may therefore capture images of staff, parents, children and visitors and store them securely on site for a period of less than a year from the time of capture for security, training and administration purposes. The ground and basement floor CCTV cameras also capture audio. This is stored on site.

Legitimate Interests

In some situations, we process your personal data to pursue our legitimate interests as a business. We will only process your personal data if our legitimate interests do not materially impact your interests, fundamental rights, or freedoms. An example of processing for reasons of legitimate interests would be the processing of information gained by CCTV: we may use CCTV cameras/footage to review any child related accidents

or incidents, assist with crime prevention, monitoring our policies/procedures, training and development, internal and external investigation/proceedings, and law enforcement activities.

Date: September 2024
By: Danny Webb
Review date: September 2025