

64. Privacy Policy (GDPR)

EDITION 1



Who we are

We are Dicky Birds Pre School Nurseries Ltd providing childcare to families in South West London.

We are the data controllers of information provided about children and their families who are in contact with us.

We are committed to maintaining the trust and confidence of families in our nurseries, on our waiting lists, our staff and visitors to our website.

This privacy policy sets out how we use and protect any information that individuals give us about themselves or their families.

Should we ask you to provide certain information by which you or your family can be identified; you can be assured that it will only be used in accordance with this privacy policy.

What is personal data?

We collect personal information about individuals and families. This includes parents, children, family members and our staff.

"Personal information" is any information that can be used to identify an individual. For instance, this is data that allows a person to be identified such as a name, phone number or home address. The processing of personal data is governed by the General Data Protection Regulation (the GDPR).

Dicky Bird Pre School Nurseries Ltd is registered with the Information Commissioner's Office under registration reference: Z9197010. The certificate for this can be viewed [here](#).

Types of data we collect

Website Cookies

We use website Cookies to improve your experience when using our website and to

64. Privacy Policy (GDPR)



EDITION 1

improve our range of services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

Further information about how we use cookies can be viewed [here in our Cookies Policy](#).

Mailing Lists

When you join our nursery/waiting list we send information via email such as our weekly e-newsletter 'The Chirp', and other emails that we believe to be of interest and relevance to you.

We use that information for a couple of reasons: to tell you about information you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, MailChimp, to store your name and email address and to deliver our newsletter and group emails. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's privacy notice](#).

How to unsubscribe

You can unsubscribe from our mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our Head Office Team at gdpr@dickybirds.co.uk.

What information do we hold on your children?

This information includes date of birth, gender, contact details of parents/carers, attendance information, characteristics such as ethnic group, religion, any safe guarding arrangements, special educational needs, medical information, developmental records and photographs.

64. Privacy Policy (GDPR)

EDITION 1



What information do we hold on parents/carers?

We hold personal information on parents/carers such as contact details, correspondence between ourselves and the parent/carers, National Insurance Numbers and dates of birth. At some of our sites we hold Biometric data (finger prints) for secure access to the buildings.

We also hold some financial information of parents/carers

When your child joins the nursery you pay us for our services. This is usually by standing order, childcare voucher or card payment. We do not store this data by default. However you may have emailed it to us or giving it to us verbally by telephone. In which case this data is stored securely on our server.

When taking card payments via telephone we do not store your card details. We use a 3rd party payment provider Lloyds Cardnet to process payments. Lloyds Cardnet process data in accordance with Payment Card Industry – Data Security Standards (PCI DSS). Further details of how they protect and process data can be viewed [here](#).

We also use Sage Pay to process the payment of a registration fee via our website. Details of how they protect and process data can be viewed [here](#).

What information do we hold on individuals connected to your child?

We hold contact details and photographs of individuals who have consent to collect your child from nursery, who are an emergency contact or who are a healthcare professional working with your child.

Giving consent for us to hold and process your and your children's data

Children are not able to give consent for their own data until they are 16, so as part of our registration and admission process new parents complete a registration form (when joining the waiting list) and a Child Entry Form (upon acceptance of a place at the nursery) to give consent for us to hold and process their own and their child's personal data.

64. Privacy Policy (GDPR)

EDITION 1



What information do we hold on our staff?

In our personnel records for staff members we hold contact details, personal information, DBS details, bank details and medical information. Our staff members give consent for us to hold and process their data by signing an employment application form or employment contract with us.

We use a 3rd party called Streets Chartered Accounts to process our payroll. Further details of how they protect and process data can be viewed [here](#).

How do we process personal data?

Dicky Birds Nurseries complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that sufficient technical measures are in place to protect personal data.

What do we use personal data for:-

- To support children's development and wellbeing and to monitor their progress.
- To administer our nursery records
- To administer our personnel files
- To administer our financial records
- To keep parents informed of their children's wellbeing, news, events and important updates and information

Our lawful basis for processing data

64. Privacy Policy (GDPR)

EDITION 1



Under GDPR legislation companies are required to have a lawful basis for processing data they hold. This ranges between consent from an individual to process their data, to a company's legal duty to process data.

What is the lawful basis for processing data for children who attend our nurseries?

We have legal obligations that require us to collect, process and store personal information in compliance with the [Statutory Framework for the Early Years Foundation Stage \(Safeguarding and Welfare Requirements\)](#) and [Ofsted](#) . These legal obligations override GDPR and therefore we do not require consent to record and process certain data from parents/carers or children.

The Local Authority (LA) uses information about children to carry out specific functions which it has a legal responsibility for. For example the LA will make an assessment of any special education needs a child may have, investigate safe guarding concerns and process Early Years Free Entitlement Funding.

What is the lawful basis for processing data for children and their parent/carer on our waiting list, or who have enquired via our website/telephone/email?

Our lawful basis for processing the above information is that you have giving your consent by requesting that we contact you.

What is the lawful basis for processing our staff member's personal data?

Processing is necessary for carrying out legal obligations concerning employment and HMRC.

Where do we store data?

64. Privacy Policy (GDPR)

EDITION 1



Electronic data

Our computer servers are hosted locally and locked in a secure area with encrypted backups.

Data is held within folders that are secured on our servers by security groups.

Within our server we hold data on a CRM which is again hosted locally.

Membership of the security groups is based on the requirement to access different areas of data and the membership of these groups is reviewed by the management team on a regular basis.

Anti-Virus software is used to scan the data as it is accessed.

Encrypted backups are regularly taken throughout the day to allow for data recovery.

Telephone data

We use a Voip (Voice Over Internet Protocol) telephone system. We do not record telephone conversations but we do receive voicemails. These voicemails are deleted after being listened to or within 14 days of recording.

All our Telephone control panels and their information are located and stored in secure systems and data centres complying to [ISO 27001](#), this is an industry standard for systems and procedures for data security.

Information that comes to us via our website

Individuals' data that comes via our website (enquiries and waiting list registrations) is uploaded to our CRM database coming first via an external server provided by Memset. You can read about Memset's GDPR compliance [here](#).

Documents and Forms – hard copies

Documents based in the nurseries are stored within the nursery rooms and the Managers office and are accessed on a need to know basis and in accordance with our Privacy Policy.

64. Privacy Policy (GDPR)

EDITION 1



Sharing personal data

Personal data is treated as strictly confidential and will only be shared following our Confidentiality Policy, Access and Storage of Information Policy, Privacy Policy and Safeguarding and Child Protection Policy. Our policies can be viewed [here](#).

- We have a legal obligation to disclose any information to the Local Safeguarding Children's Board that is related to the safeguarding of a child.
- We will share your information The Local Authority to ensure your child is able to receive the Early Years Free Entitlement Funding or if your child has or is being monitored for Special Educational Needs.
- We will share information with the primary school that your child will eventually attend or another setting that they may move to.
- With your prior consent we may share your information with your Childcare Voucher providers.

How long do we keep personal data?

We keep data in accordance with the guidance set out in the Statutory Framework of the Early Years Foundation Stage, Limitation Act 1980, keeping children safe in Education 2016, OFSTED, Childcare Register 2016, and HMRC. Retention periods are detailed in our [Data Retention Policy and Schedule](#).

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:-

- The right to request a copy of your personal data which we hold about you or your child

64. Privacy Policy (GDPR)

EDITION 1



- The right to request that we correct any personal data if it is found to inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time.
- The right to request that we provide your or your child's personal data and where possible transmit that data directly to another data controller.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data.
- The right to lodge a complaint with the [Information Commissioners Office](#) (ICO).

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Questions and who to contact

To exercise all relevant rights, queries or complaints please contact our Data Protection Officer Natali O'Farrell on 020 8942 5779 or by email gdpr@dickybirds.co.uk or in writing to:-

Dicky Birds Pre School Nurseries Ltd

Anchor House, Burgoine Quay

8 Lower Teddington Road

Kingston-Upon-Thames

Dicky Birds Nurseries Policies
64. Privacy Policy (GDPR)



EDITION 1

Surrey

KT1 4EU

You can contact the [Information Commissioners Office](#) help line on 0303 123 1113

Legal framework

- [General Data Protection Regulation](#) (2018)
- [Early Years Foundation Stage Statutory Framework](#) (2017)
- [Ofsted Early Years Compliance](#) (2016, updated 2018)
- [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (2015)

This policy will be reviewed annually and amended according to any change in law/legislation.

This policy should be viewed in conjunction with our Access & Storage Policy, Client Access to Records and Confidentiality Policies.

Updated	<i>May 2018</i>
Updated by	<i>Natali O'Farrell Data Protection Officer</i>
Date to be Reviewed	<i>May 2019</i>

Dicky Birds Nurseries Policies
64. Privacy Policy (GDPR)

EDITION 1

