

DATA PROTECTION: PRIVACY NOTICE FOR EMPLOYEES, BOARD MEMBERS AND VOLUNTEERS

Amendment History

Revision	Author	Description of change	Date updated
Original	CH & SF	New policy following GDPR training	June 2018
1	CH & SF	Review, no significant changes	March 2019
2	CH & SF	Updated to 'Data Protection: Privacy Notice'	January 2020
3	CH	Replace CDC with WPAS	June 2022
4	CH, TH & XF	Updated Playgroup's email contact	July 2023

PRIVACY NOTICE FOR EMPLOYEES, BOARD MEMBERS AND VOLUNTEERS

Introduction

When you work or volunteer at Playgroup, you trust us with your personal data. We are committed to keeping that trust, which starts with sharing our privacy practices. This Privacy Notice explains in detail what personal data we collect and how we use that information.

This Notice applies to any user of Playgroup's services, websites, apps and social media anywhere in the world.

Who are we?

Kineton Playgroup is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

You can contact Playgroup as the Data Controller in writing at kinetonplaygroup@welearn365.com

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Sensitive data' information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about you?

The information that we collect, hold and share (including information provided when you make an application) includes where relevant:

- Personal information including your name, home address and contact details
- Characteristics such as ethnicity, language, nationality and country of birth
- Evidence of photographic identification for right to work in the UK
- All information required for payroll, Disclosure and Barring Service application
- Evidence of qualifications
- Personnel information such as references, previous employment history, suitability to work with children and declaration of interests

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- Attendance information such as sessions and hours attended, holiday requests, number of absences and absence reasons.
- Training records and review records
- Disciplinary and grievance records
- Relevant medical information and details of disabilities
- Contact information for emergency contacts, including telephone numbers, home and work addresses and e-mail addresses.
- All information required by Ofsted, Companies House and Charities Commission.

Why do we use personal information?

We use this data to create records:

- to respond adequately to your requests for information
- to support training and development
- to monitor and report on progress
- to provide a safe and healthy environment
- to assess the quality of our services
- to comply with the law
- to safeguard children
- to manage our financial systems such as payroll
- to aid in the administration of our services
- to manage the business
- to obtain and provide references
- to comply with Ofsted, Companies House and Charities Commission requirements
- to maintain Disclosure and Barring Service records
- to maintain the Single Central Record

Collecting information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

What is the legal basis for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose information in order to meet certain legal requirements and legal obligations placed upon the setting by law. We are required to process this personal information for such purposes even if you have not consented to us doing so. Examples include child/adult care regulations, safeguarding/health/safety regulations, tax and government funding regulations.

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2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used. You have the right to withdraw your consent at any time.

4) To perform tasks in the public interest

It is a day-to-day function of Playgroup to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that children are properly educated and supported.

5) For the performance of a contract with you

We are able to process personal information when it is necessary to fulfil our contract with you.

5) For the purposes of legitimate interest pursued by the Data Controller or a third party

We are able to process personal information when it is necessary for the legitimate function of the setting, for example day lists, safeguarding and payroll records.

Sensitive personal data

In order to process 'sensitive personal data', we must be able to demonstrate how the law allows us to do so. In addition to the legal basis above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- Explicit consent of the data subject
- Processing relates to personal data which is manifestly made public by the data subject
- Necessary for establishing, exercising or defending legal claims
- Necessary for reasons of substantial public interest
- Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- Necessary for archiving, historical research or statistical purposes in the public interest
- Necessary for equal opportunities monitoring
- Necessary under employment law

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Who might we share your information with?

We routinely share your information with:

- Warwickshire County Council
- Department for Education
- SEND Support agencies such as Warwickshire's Integrated Disability Service (IDS), Warwickshire's Warwickshire Preschool Autism Service (WPAS), Warwickshire Speech and Language Therapy Service (SLT)
- Ofsted
- Disclosure and Barring Service
- Companies House and Charities Commission
- Cooke and Watts for payroll
- Citation
- Grimeaux Accountants
- AFH Wealth Management, Aviva and Legal & General for pensions
- Westfield Health
- Training providers such as St John's Ambulance, Paragon (or any other NVQ provider)
- Tesco Photo Yearbook
- Tempest Ltd for portrait and group photographs
- Wix.com – Playgroup's website
- Childrens and Families Front Door and Children's Team
- Health Visitor Team
- Other staff, parents and visitors only as part of the day to day setting routines such as newsletter and day lists
- Other settings or businesses (eg when a reference is requested)

We do not share information about you unless the law and our policies allow us to do so.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. Playgroup monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, Playgroup complies with its Document Retention Policy. The Policy sets out the Statutory Provisions under which Playgroup are required to retain the information.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

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What are your rights with respect of your personal information?

Under data protection law, you have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your records, contact the Playgroup.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>