

Green Lane Nursery

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DATA PROTECTION POLICY

A) INTRODUCTION

We may have to collect and use information about adults and children with whom we work with at the Nursery. This personal information must be handled and dealt with properly, however it is collected, recorded, and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the *General Data Protection Regulation (GDPR)*.

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with our human resources function as described below. It also covers our response to any data breach and other rights under the *GDPR*.

This policy applies to the personal data of children who attend *GLN*, job applicants, existing and former employees, apprentices, volunteers, placement students, workers, and self-employed contractors. These are referred to in this policy as relevant individuals.

B) DATA PROTECTION PRINCIPLES

Under *GDPR*, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful, and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant, and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant *GDPR* procedures for international transferring of personal data

C) DATA SECURITY

All our children's files are kept in a locked filing cabinet, drawer, or safe.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to children should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where necessary.
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

D) RECORDS

GLN keeps records of its processing activities including the purpose for the processing and retention periods in its HR Data Record. These records will be kept up to date so that they reflect current processing activities.

E) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is: **Giovanna Hasham**

Reviewed on: 01/07/2023