



## GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

### Policy Statement

ABI Nurseries Limited t/a The Akhter Early Learning Centre aims to fulfil its obligations under the General Data Protection Regulation (GDPR) 2017 to the fullest extent. This policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collecting, processing, using, storing and sharing of personal data.

We have appointed a Data Protection Co-ordinator who is responsible for ensuring our compliance with the GDPR.

Their contact details are:

- Name: Jason Taylor
- Telephone: 01279 927020
- E-mail: [jason.taylor@akhter.co.uk](mailto:jason.taylor@akhter.co.uk).

We are registered with the Information Commissioners Office (ICO).

All staff, volunteers (and committee) have undertaken training in the GDPR and are aware of their responsibilities in collecting, using and sharing data.

We have a privacy notice that sets out the lawful bases for processing the data, the legitimate interests for the processing, individual's rights and the source of the personal data.

We have a process in place to record any data breaches and a form for reporting breaches to the ICO and any investigations.

We have a policy in place for the retention of documents and archiving of them.

We have an asset register in place to record the different types of information and documentation that we hold. This is updated regularly. We also have a spreadsheet showing how information is processed, stored and shared.



## Procedure

This provision is aware that data protection legislation applies equally to children, parents/carers and staff. Article 5 of the GDPR sets out the principles that we work:

- Data must be processed fairly, lawfully and in a transparent manner.
- Data must only be obtained for specified and lawful purposes.
- Data must be adequate, relevant and not excessive (limited to what is necessary).
- Data must be accurate and up to date.
- Data must not be kept for longer than necessary.
- Data must be securely kept.

We use the GDPR rights for individuals.

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision-making and profiling.

The following procedures apply to information held about children.

1. A child's records will be disclosed to their parent or carer on submission of a written request. Requests will only be refused if it is obvious the requester does not understand what they are asking for, or if disclosure is likely to cause them or anyone else serious physical or mental harm.
2. A child's records will be made available without charge within 15 working days of receipt of the written request. If a copy of the information is requested, a charge may be made but it will not exceed the cost of supply.



3. Children's records will be stored securely. Paper files are locked in cabinets in the provision's office. Electronic files are stored on; 1) the provision's secure computer server, 2) hosted secure cloud server (Eylog data only). Computers within the provision are kept secure with appropriate software to ensure maximum protection against ransom and malware which is regularly updated. All data is securely backed up on; 1) the provision's secure computer server, 2) a secure USB memory stick (Firststeps data only), 3) hosted secure cloud server (Eylog data only).
4. Information that is shared is done securely using a secure email system or password protection of the document.

The following procedures apply to information held about parents and carers.

1. A parent or carer's records will be disclosed to the parent or carer on submission of a written request. Requests will only be refused if it is obvious the requester does not understand what they are asking for.
2. A parent or carer's records will be made available without charge within 15 working days of receipt of the written request. If a copy of the information is requested, a charge may be made but it will not exceed the cost of supply.
3. Parent and carer's records will be stored securely. Paper files are locked in cabinets in the provision's office. Electronic files are stored on the provision's secure computer server. Computers within the provision are kept secure with appropriate software to ensure maximum protection against ransom and malware which is regularly updated. All data is securely backed up on; 1) the provision's secure computer server, 2) a secure USB memory stick (Firststeps data only).
4. Information that is shared is done securely using a secure email system or password protection of the document.

The following procedures apply to information held about staff.

1. A copy of their personal data is sent to each member of staff on 1<sup>st</sup> July each year. This applies to all data, whether held on computer or as hard copy.
2. Members of staff are required to read this information carefully and inform the Akhter Early Learning Centre manager or their deputy at the earliest opportunity if they believe that anything is inaccurate or untrue, or if they are dissatisfied with the information in any way.
3. Requests for additional access must be sent to Jason Taylor Each request will be judged in light of the nature of the information in question and the frequency with which it is updated. The member of staff will then be informed whether or not the



request is granted. In the event of a disagreement, the matter will be taken up under the formal grievance procedure.

4. If a request for additional access is granted, the information will be provided within 30 days of the date of the request. A fee will not be charged to gain access to the data. However, we can charge a “reasonable fee” if a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.

The following procedures apply to any third parties that we are contracted with.

1. We have documents from each contractor confirming their compliance with GDPR.
2. We have agreed safe sharing of information.
3. Confidentiality agreements are in place.

The person responsible for carrying out this policy is Jason Taylor

Signed:

A handwritten signature in black ink, appearing to read "Jason Taylor", is written over a light grey rectangular background.

Date: 14<sup>th</sup> May 2018

Policy review date: Annually

---