

Camden Community Nurseries Privacy Notice

Camden Community Nurseries Ltd. ("CCN") will ensure that personal data is processed and performed in compliance with UK data protection regulations, and is also sufficiently protected. This privacy notice outlines how CCN will collect and process information about parents (our customers and prospective customers), children enrolled in our nurseries, employees and job applicants, suppliers and contractors.

Who controls your data?

The data controller is Camden Community Nurseries (Co. No. 02575796). This is a charity organisation limited through guarantee based in UK (Charity No. 1002534). Our head office is based at 16 Acoll Road, London NW6 3AG. This organisation is also registered with the ICO (Reg. No. ZA308212)

Why does CCN Collect your data

CCN will only request the minimum amount of information necessary to provide you with the service you have requested or to discharge a legal obligation. The main reasons for collecting data are as follows:

- To provide parents and their children with child care services;
- To provide a safe and healthy environment within our childcare settings;
- To provide information to our parents about the activities of the nurseries, upcoming events and fundraising activities – we will ask for your consent to receive such information over email;
- To provide feedback to parents on the progress of their child against the Early Foundation Years requirements;
- To aid in the administration of our services to our customers;
- To administer first aid, emergency and other medical care, when necessary;
- To comply with laws, and government regulations/standards;
- To support our business purposes and functions related to the services, such as education, training, curriculum, communication, administration, and record-keeping;
- To facilitate and process payments for the services we provide;
- To fulfil tax, reporting, and other financial requirements and obligations;
- To administer employee payroll, benefits, tax/regulatory compliance and other record keeping and administration requirements; and
- To consider applications for employment.

What personal data does CCN collect about you?

Depending on our relationship with you, we will collect different types of personal information:

A. Employees and Prospective Employees

We need to collect information from you to fulfil our employment contract with you, such as your name, address, email and telephone number so that we may contact you about areas relating to your employment with us. If you are a prospective employee, we will also collect this information as a measure to potentially enter into a contract with you, depending on your performance during our selection process.

As an employee, we will also need your bank details so that we can fulfil our contractual obligations to pay you through our payroll services. Payroll services are provided through a third party called, JCS. To ensure that you are meeting the standards of employment in our contract, we will also conduct regular performance reviews with you, and only where necessary may have to develop formal action plans to resolve any underperformance issues.

As an employer operated in a highly regulated environment, for the purposes of satisfying our legal obligations we will also need to collect the following personal information from you:

- References from previous employers and qualification checks
- Evidence of your Right to work in the UK
- An Enhanced Check with the Disclosure and Barring Service. Access to this service is provided to us through a third party Ucheck who will take your receipt of the minimum personal details required to perform the check. We will also need to see proof and to retain information that proves your identity to ensure that these checks are performed correctly.
- Any Safeguarding concerns identified during your employment, which may also need to be reported to the DBS above.
- Your health data - this is so that we can discharge our regulatory responsibility to you to ensure your health and well-being in the work place;

Any personal information processed by us will be held for the duration of your employment. Upon termination of the job contract, we will retain the minimum information necessary to provide you with a future reference, or to fulfil any of the legal requirements outlined above.

B. Parents and their children

1. To provide childcare services to our Parents, we will need to obtain and hold the following information:
 - To register you and your child with our nurseries we will require you to provide us with your contact details (name, address, telephone number and email) and your child's information (name, gender and DOB).
 - As we are a Charity that looks to promote childcare services to all members of our diverse community, we also request confirmation of your household income where you are applying for reduced fee bands to promote fairness and inclusiveness to all our members.
 - For the purposes of invoicing, we will need your name, physical and email address.
 - We also need to collect child's ethnicity for Government Census purposes.
2. To ensure that our nursery settings can protect your child's vital well-being and health, we need to collect health information about your child, such as information on allergies, food restrictions, medical conditions, status of inoculations and GP contacts. As health information is classed as Special Categories of Data, this data will be secured and only accessed and shared where necessary to protect the interests of the child.
3. As a regulatory requirement, where your child may also have Special Educational Needs arising from physical or mental health conditions, we will need to collect information relating to their Needs, and this information will be disclosed to relevant carers within and without the organisation to ensure that the needs of your child are catered for.

For data outlined in 1-3 above, we will aim to retain the information only for so long as your child is within the nursery setting with us.

4. Any accidents that occur on our premises by law require thorough documentation and will be shared with you to make you aware of the impact to your child. Where the accident is significant, such as where it involved the hospitalisation of your child, we may need to report the particulars of the incident to MASH/OFSTED/RIDDOR to comply with our legal obligations. Any accident information by law needs to be held until the 21st birthday of the child involved in the incident.
5. We will seek your consent to use photographs of your children within any Social Media channels, displays in the nursery settings, use in our newsletter and within CCN marketing material. For any use in CCN marketing material your child will not be named. You can withdraw this consent at any time (please see information below under Rights)

6. Safeguarding Disclosure

When your child is with us, our primary concern is for their health and well-being. As a child care provider, we have a legal obligation to Safeguard your child. We have procedures in place that are trained to our staff to identify any safeguarding concerns with your child. Where we become aware of an incident that could affect the safety of your child we may have an obligation to provide the details of the incident to MASH and to OFSTED, which will include personal data to identify the child involved. We will communicate with you before any such referrals are made to ensure that we understand the full facts of the incident, but even without your consent we may be compelled to share this information. Any safeguarding information relating to your child will need to be held until their 24th birthday to comply with legal obligations.

7. Local authority funding

If you apply to the local authority for funding, you will be required to fill out a registration form. The London Borough of Camden are responsible for defining the criteria for funding offered and the information collected from parents and children. CCN will make the application on your behalf, will keep records of the funding applied for, but is not the data controller for information submitted to the London Borough of Camden or involved in the decision-making for whether you are eligible for this funding.

8. Reasons we can collect and use your personal information

We collect and use personal information to comply with our legal obligations under section 537A of the Education Act 1996, section 83 of the Children Act 1989, and to carry out tasks in the public interest. If we need to collect special category (sensitive) personal information, we rely upon reasons of substantial public interest (equality of opportunity or treatment).

C. Suppliers and Contractors

For individual, non-incorporated suppliers and contractors, we will only keep the minimum information required to execute the services that you have been commissioned for and to facilitate the payment of invoices to you, such as your name, address, telephone number and bank account details.

For agency staff involved with the provision of childcare within our settings, we will not retain information about you other than your name and contact details as all other information will be held by your employer.

Where does CCN store personally identifiable information?

Electronic Information: We utilise electronic storage systems that involve transfers to the US. We have assured that these third parties have adequate security measures in place and that the transfer complies with data protection laws.

Hardcopy Information: The hardcopy of personal information we collect will remain within our organisation, and will be subject to access control procedures and physical security arrangements.

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Sharing of personal data

Camden Community Nurseries considers your personal information confidential and does not share it with others except as described in this privacy policy.

There are limited circumstances that require Camden Community Nurseries to disclose your personal information to others in order to deliver services. We may disclose your information, as necessary to the following:

To Agency Staff: In order to provide us with flexible resourcing, we contract with agencies to provide childcare staff. We may share sensitive data only as appropriate and necessary for the performance of the service. These parties are under contractual obligations to use your personal information only as needed to perform these functions.

For Business Transfers: If Camden Community Nurseries is sold, personal information relevant to the operation sold could be transferred as part of the transaction.

To Meet Legal Requirements: We may share personally identifiable information with law enforcement or other government entities as required by law/regulations or as we reasonably determine to be necessary to protect our rights or the rights of others, to prevent harm to persons or property, to fight fraud, or to enforce our web site terms of use. Other parties that we share information with:

- Department for Education (DfE) (statutory for early years funding and policy monitoring)
- Camden Council (to provide funding, Safeguarding disclosures, and to improve outcomes for children)
- Other local authorities, or other early years settings, to resolve duplicate claims and funding queries
- Schools that you attend after leaving us
- We will share personal information with law enforcement or other authorities if required by applicable law.

Your Rights

You have rights which you can exercise free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you (Subject Access Requests)
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office
- Withdraw consent (if applicable)

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you wish to action any of these rights please email: dpo@camdencommunitynurseries.org.uk

Alternatively, please write to:

Data Protection Officer

Camden Community Nurseries

16 Acol Road

London NW6 3AG

If you wish to make a complaint, you can also contact the [ICO](#)

Will this Privacy Policy change?

This privacy policy is subject to change and we will post revisions on our website. Please check back periodically, especially before you provide any personal information.

This privacy policy was last updated in May 2018.