



Caterpillars Pre-School

Data Protection Policy

June 2020



Policy Statement

To fulfil its business, Caterpillars Pre-school may have to collect personal information about its employees, trustees, Children, parents and visitors. It is also necessary to process information so that staff can be recruited and paid, activities organised and fulfil our obligations to funding bodies. All personal information will be handled and dealt with appropriately to meet the requirements of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) 2018 whenever we collect, store or destroy personal data, however it is collected and used.

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

To comply with the law, information must be collected and used fairly, stored safely and disclosed to any other person unlawfully. To do this, Caterpillars Pre-school must comply with the Data Protection Principles which are set out in the data Protection Act 1998. In summary these state that personal data must be:

- Obtained and processed fairly and lawfully;
- Obtained for a specified and lawful purposes and not processed in any manner incompatible with that purpose; adequate, relevant and not excessive for that purpose;
- Accurate and up to date;
- Not kept for longer than is necessary;
- Processed in accordance with the data subjects rights;
- Kept safe from unauthorised access, accidental loss or destruction;
- Not to be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

All Caterpillars Pre-school staff and volunteers who process or use any personal information must ensure that they follow these principles at all times. In order to ensure this happens, Caterpillars Pre-school has adopted this Data Protection Policy.

Notification of Data Held and Processed

All Employees, trustees, parents, visitors and other members of the public have the right to:

- Know what information Caterpillars Pre-school holds and processes about them and why;
- Know how to gain access to it;
- Know how to keep it up to date;
- Know what Caterpillars Pre-school is doing to comply with its obligations under the Act.

The Data Controller and Designated Data Controllers

Caterpillars Pre-school, as a registered charity is the Data Controller under the Act and the organisation is therefore ultimately responsible for implementation. However, Designated Data Controllers will deal with day to day matters. Caterpillars Pre-school's Designated Data Controllers are;

- Caterpillars Pre-school Management Committee
- Sarah Powell – Manager, Marks Tey
- Chrystal Clark – Manager, Birch



Personal Information

Personal Information is defined as any details relating to a living, identifiable individual. Within Caterpillars Pre-school this relates to employees; attending children and their families; trustees; professional visitors; some members of the public e.g. job applicants. We need to ensure that the information gained from each individual is kept securely and to the appropriate level of confidentiality.

The personal information collected from individuals could include:

- Their name
- Address
- Email address
- Telephone number – including those of emergency contacts
- Date of birth
- Medical information
- National insurance number
- DBS numbers
- Observations of children's progress (Learning Journals)
- Children's reports from the pre-school or from outside professionals
- Photographs
- Videos
- Family medical history where necessary

Caterpillars Pre-school store personal information to comply with the statutory framework (EYFS 2019) ; to deliver services to our families e.g. Government funding or to enable suitable people for our settings.

Processing of Personal Information

All staff and volunteers who process or use any Personal Information are responsible for ensuring that:

- Any personal information which they hold is kept securely
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

Staff and volunteers should note that unauthorised disclosure will usually be a disciplinary matter and may be considered gross misconduct in some cases.

Personal Information should be:

- Kept in a locked filing cabinet or lockable storage unit; or
- In a locked cupboard; or
- If it is computerised, be password protected;
- Kept on a storage device which is kept securely.

Conversations and Meetings

Information of a personal or confidential nature should not be discussed in a public area, in front of anyone that is not an employee of the Pre-school. Pre-school employees should be aware of confidentiality at all times when discussions are taking place, either distancing themselves from the conversation if it does not concern them, or, ensuring that their discussion is not overheard by others.



When meetings are being recorded it is important that only relevant information is written down. This must be carried out using the correct forms provided by the Pre-school, notes must be written legibly and coherently. The written notes are then stored in a locked cupboard and disposed of (shredded) in a timely manner once the child/family have left the setting (1 year unless it relates to a child protection matter)

Collecting Information

Whenever information is collected about people, they should be informed why the information is being collected, who will be able to access it and to what purpose it will be put. The Individual concerned must agree that he or she understands and gives permission for the declared processing to take place, or it must be necessary for the legitimate business of the pre-school.

Sensitive Information

Sensitive Information is defined by the Act as that relating to ethnicity, political options, religious beliefs, trade union membership, physical or mental health, sexual orientation, criminal proceedings or convictions. The person about whom this data is being kept must give express consent to the processing of such data, except where the data processing is required by law for employment purposes or to protect the vital interests of the person or third party.

Disposal of Confidential Material

Sensitive material should be shredded as soon as it is no longer needed; following retention guidelines and statutory requirements. Particular care should be taken to delete information from the tablets or the computer hard drive if they are to be disposed of.

Staff Responsibilities

All staff are responsible for checking that any information that they provide to Caterpillars Pre-school in connection with their employment is accurate and up to date. Staff have the right to access any personal data that is being kept about them, either on computer or in the manual filing systems. Staff should be aware of and follow this policy and seek further guidance where necessary.

Duty to Disclose Information

There is a legal duty to disclose certain information, namely, information about: Child abuse, which will be disclosed to social services, or drug trafficking, money laundering or acts of terrorism or treason, which will be disclosed to the police.

Retention of Data

Caterpillars Pre-school takes care only to store personal information that is absolutely necessary.

Personal information is kept for the period of time requested following guidelines from the Early Years Alliance (EYA), these retention periods are either recommended or statutory.



Stored information is filled in sealed boxes and is stored in a locked filing cabinet once the retention period has lapsed, the information is confidentially shredded.

Requirement to Notify Breaches

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

This policy was adopted by Caterpillars Pre-School

In	June 2020
Date to be reviewed	June 2021
Signed on behalf of the management committee	
Name of signatory	Matthew Doonan
Role of signatory (e.g. chair/owner)	Chair of the Committee