

Nursery Privacy Notice

The University of Bradford Nursery is a registered Childcare provider with Ofsted and takes its obligations seriously including those under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA).

In order to provide a service, the Nursery will process personal data relating to children that are attending and have applied to attend and their parents/guardians and any carers that they have nominated for the following purposes:

- Correspond with and to contact parents/guardians/carers in relation to its services and activities;
- Processing applications;
- Providing and recording the care and education children receive, including the creation of a learning journey, assessment and keeping parents informed;
- Sending newsletters, information about events, trips and external educators;
- Implementing the University's Child Safeguarding Policy to ensure that every child is kept safe from neglect and harm;
- Making referrals to external professionals when there is a concern about a medical or educational need in order to obtain the necessary support and advice;
- Provision of emergency care or first aid; and
- Fulfilling our legal, regulatory and safeguarding obligations.

Under what legal basis does the processing of my personal data take place?

The GDPR and DPA provide for a number of different legal bases under which processing of personal data may take place. In this case, the following bases apply:

Processing shall be lawful only if and to the extent that at least one of the following applies:

- Processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract. In this instance, the contract is with parent/guardian for the nursery to admit their child.
- Processing is necessary for compliance with a legal obligation to which the University of Bradford is subject. These include the Childcare Act 2006, The Children Act 2006, child protection and safeguarding requirements (such as Working together to Safeguard Children 2018) requirements, OFSTED and EYFS statutory framework 2017 requirements, equal opportunities, immigration and public safety requirements etc.
- Processing is necessary for the purposes of the legitimate interests pursued by the University or by a third party. These may include, for example, for the purpose of planning, reviewing, managing and developing the Nursery's and the

University's business, (but not to make any decisions about parents/carers or children)).

- You have given consent to the processing of personal data for specific purposes. When we do this, we will collect it at the appropriate time, explaining why we are collecting the data and how we will use it, and that this consent can be withdrawn at any time.

Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. We will usually only process special category data with explicit consent but other very limited conditions specified in the GDPR and DPA permit this type of information to be processed. These include processing:

- For the establishment, exercise or defence of legal claims;
- To comply with legal obligations which the University and the Nursery have, including child protection and safeguarding requirements, complaints procedure;
- Very occasionally, when required, to protect a parent/guardian's or a child's vital interests, e.g. in an emergency.

What categories of personal data are used?

To run the Nursery efficiently and safely information is only collected that is relevant and proportionate. This includes:

Personal data relating to parents/guardians/carers:

- Name, address and contact details;
- Relevant employment/study details (for University staff and students only);
- Designated person details (we assume that they have agreed to this information being provided to us);
- Emergency contact details (we assume you will have permission to provide these details to us if these relate to others);
- Financial information relating to the payment of fees; and
- Any other personal information provided to us in subsequent correspondence or discussions.

Personal data relating to children:

- Name and address;
- Date of birth;
- Doctor/health visitor information;
- Dietary information;*
- Personal preferences;
- A photograph;
- Gender;
- Religion;*
- Ethnicity and race;*
- Any health, medical and disability information including sickness records;*
- Observations - these are made in line with the Early Years Foundation Stage (EYFS) and are made up of both written and photographic evidence (as agreed with parents/carers on induction) to form a reflection of the child's learning at nursery;

- Records of referrals to specialist early years' services; including safeguarding and child protection concerns (which may necessitate retaining information about people connected with the child solely for the purposes of a referral);
- Records of any contact between the Nursery and medical practitioners or health visitors; and
- Any other personal information provided to us in subsequent correspondence or discussions.

Some of the information processed by the nursery is classed as special category data. This is indicated with an asterisk (*).

The Nursery will also ask, as part of the application and induction process, whether parents/guardians consent to photographs being taken of their child at the Nursery. If consent is provided it may, subsequently, be withdrawn at any time;

Where do we get your personal data from?

- Forms completed by you either at registration or subsequently
- Discussions with parents/guardians
- Early Educational Funding (EEF) forms
- Early years provisions previously attended or still accessing
- Health care professionals
- Social Services
- City of Bradford Metropolitan District Council (Early Years)

Who else do we pass this information on to?

Personal data can be shared with a number of third party organisations.

We will only share information where we have a specific purpose (as can be seen above) or where required by law. Examples of situations where we may share information include the following:

- We will disclose information about children in our care and/or their parents/carers when it is necessary to meet child protection and safeguarding requirements and procedures. This is likely to occur when the Nursery has reason to believe that there is a threat to a child and referral to the local authority needs to be made. This will be done in accordance with our Child Safeguarding Policy and the advice of the local safeguarding children's board;
- Data must be presented to OFSTED when requested, for example, as part of an inspection or when the identity of the inspecting officer has been verified;
- Information may be shared with the local authority to enable access to the 15/30 hours Early Educational Funding (EEF).

Except as stated above and as explained to you by our staff we will disclose any personal data to other external enquirers or organisations unless you have asked us to, have consented to it, or unless one of the legal bases above applies. We will not publish personal data without your consent.

How long do we keep this information for?

All information is held in line with the University's Record Retention Policy.

What are your rights as a data subject?

As a person whose personal data we are processing, you have certain rights in respect of that personal data; you have the right:

- To withdraw consent: if you wish to draw consent, you can do so at any time by contacting Sarah Barnes (Nursery Manager) either by email; s.smith7@bradford.ac.uk or by post; University of Bradford Nursery, Laisteridge Lane, Bradford, BD7 1DP;
- To access your personal data that we process;
- To rectify/update inaccuracies in personal data that we hold about you if it is inaccurate or incomplete;
- To request the deletion or removal of your personal data where there is no compelling reason for its continued processing;
- To restrict the processing of your personal data in certain ways;
- To obtain your personal data for reuse;
- To object certain processing of your personal data;
- To complain to the Information Commissioner's Office about the way in which we process your personal data.

Where can I get more information?

For more information please contact the University's Data Protection Officer, data-protection@bradford.ac.uk, University of Bradford, Richmond Road Bradford BD7 1DP

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