

Dingley's Promise Data Protection Policy

Associated Documents

Privacy Notice
Information Security Policy

Introduction

In this policy all reference to the General data Protection Regulation (GDPR) includes the Data Protection Act 2018 and all applicable data protection laws.

At Dingley Promise, we recognise that we hold sensitive/confidential information about children and their families and the staff we employ. This information is used to meet children's needs, for registers, invoices and emergency contacts. We store all records in a locked cabinet or on the office computer with files that are password protected in line with data protection principles. Any information shared with the staff team is done on a 'need to know' basis and treated in confidence. This policy works alongside the Privacy Notice to ensure compliance under General Data Protection Regulation (Regulation (EU) 2016/679 (GDPR) and Data Protection Act 2018.

In particular Dingley's Promise will comply with the 6 GDPR Principles set out in the 2018 Data Protection Act.

1. Personal data should be processed fairly, lawfully and in a transparent manner.
2. Data should be obtained for specified and lawful purposes and not further processed in a manner that is incompatible with those purposes.
3. The data should be adequate, relevant and not excessive.
4. The data should be accurate and where necessary kept up to date.
5. Data should not be kept for longer than necessary.
6. Data should be kept secure.

This policy statement applies to our employees, and individuals about whom the organisation processes personal information, as well as other partners and companies with which the organisation undertakes its business.

Opportunity

Dingley's Promise needs to collect and use certain types of personal information about people with whom it deals in order to operate. These include current, past and prospective employees, parents/carers, suppliers, clients, and others with whom it communicates.

In addition, it may be required by law to collect and use certain types of information to comply with the requirements of government departments. This personal information must be dealt with properly however it is collected, recorded and used - whether on paper, in a computer, or recorded on other material, all of which is documented in our organisations Privacy Policy.

We regard the lawful and correct treatment of personal information by the organisation as very important in order to secure the successful carrying out of operations and the delivery of our services, and to maintain confidence with those whom we deal.

Dingley's Promise wishes to ensure that it treats personal information lawfully, correctly and in compliance with the GDPR (2018) and as per our Privacy Notice.

We fully endorse the obligations of the Act and adhere to the principles of data protection.

Definitions

Data Controller: Any individual or organisation who controls personal data and determines the purposes and means of processing, in this instance the Nursery.

Personal Data: Information held on a relevant filing system, accessible record or computerized record (as well as digital audio or video equipment), which identifies living individuals.

Special Category Data: Personal data relating to an individual's genetic and biometric data that can identify an individual, race or ethnic origin, political opinions, religious beliefs, physical/mental health, trade union membership, and sexuality. To process this data, we will establish 1) a lawful basis and 2) a condition for processing under Article 9.

Relevant Filing System: Also known as manual records i.e., a set of records which are organised by reference to the individual/their criteria and are structured in such a way as to make specific information readily accessible e.g., personnel records, microfiches.

Data Subject: An individual who is the subject of the personal data, for example, employees, pupils, claimants, Trustees, volunteers etc.

Processing: Obtaining, recording or holding data or carrying out any operation on the data including organising, adapting, altering, retrieving, consulting, using, disclosing, disseminating, aligning, blocking, erasing or destroying the data.

Accessible Records: Any records which are kept by the Organisation as part of a statutory duty, e.g., pupil records, housing tenancy records, social services records.

How are we compliant?

To ensure our compliance to the GDPR, we will:

- have a clear retention policy for handling personal data and ensure it is not held for longer than is necessary.
- have a legal basis for acquiring and/or using any personal data.
- ensure that all staff are aware of the policy and privacy notice and follow it.
- respond to subject access requests (sometimes called personal data requests) as per our policy.

Data Protection Officer (DPO)

Dingley's Promise have opted to voluntarily appoint a designated Data Protection Officer who supports the organisation to embed, communicate and monitor the organisation's GDPR data protection policy.

The day-to-day management for effective implementation in the organisation is the responsibility of **Lee Friend, Chief Operating Officer** and he is the Operational Data Protection Lead. All staff and volunteers have responsibility for implementing the policy in their work in line with organisational guidelines and training.

Our policy

Dingley's Promise will, through appropriate management and application of criteria and controls:

- observe fully conditions regarding the fair collection and use of information.
- meet its legal obligations to specify the purposes for which information is used.
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements.
- ensure the quality of information used, including its accuracy and relevancy for the purpose(s) specified.
- apply strict checks to determine the length of time information is held.
- ensure that the rights of people about whom information is held can be fully exercised under the GDPR Act. (These include: the right to be informed that processing is being undertaken; the right of access to one's personal information; the right to prevent processing in certain circumstances; the right to correct, block or erase information which is regarded as erroneous).
- take appropriate technical and organisational security measures to safeguard personal Information

Where mobile devices such as laptops are used at home then the following needs to be adhered to:

- They never leave it in the car or on any form of transport.
- They keep it locked securely when not using the device.
- They do not let anyone use or see documents.
- Computer passwords are used not shared and also firewalls and security is kept up to date on the device.
- If it gets lost or stolen, they must report it immediately to the Chief Operating Officer, or in his absence, the Chief Executive Officer

In addition, Dingley's Promise takes steps to ensure that:

- There is someone with specific responsibility for data protection in the organisation.
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice.
- Everyone managing and handling personal information is appropriately trained to do so.
- Everyone managing and handling personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- Queries about handling personal information are promptly and courteously dealt with.



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- Methods of handling personal information are clearly described.
- A regular review and audit are made of the way personal information is managed.
- Methods of handling personal information are regularly assessed and evaluated.
- Performance of handling personal information is regularly assessed and evaluated; and
- It disseminates to employees, information on good practice in respect of handling, using and storing personal information.

A copy of this policy statement will be issued to all employees. It will be reviewed annually, added to, or modified from time to time and may be supplemented in appropriate cases by further statements and procedures relating to the work of the particular groups of workers.

Policy Updated by: Lee Friend, Chief Operating Officer

Date: September 2023

Review due: September 2024