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## **PRIVACY NOTICE**

At Mokyklele Pupa Limited, we respect the privacy of the children attending the Club and the privacy of their parents or carers. The personal information that we collect about you and your child is used only to provide appropriate care for them, maintain our service to you, and communicate with you effectively. Our legal basis for processing the personal information relating to you and your child is so that we can fulfil our contract with you.

Any information that you provide is kept secure. Data that is no longer required\* is erased after your child has ceased attending our Club.

We will use the contact details you give us to contact you via phone, text message, email or post so that we can send you information about your child, our Club and other relevant news, to send invoices and communicate with you regarding payment of our fees.

We will only share personal information about you or your child with another organisation if we; •  
Are required to by government bodies or law enforcement agencies; or  
• Have a safeguarding concern about your child; or  
• Engage a supplier to process data on our behalf (e.g. to issue invoices, to take online bookings, or to recover debts); or  
• Have obtained your prior permission.

You have the right to ask to see the data that we have about yourself or your child, and to ask for any errors to be corrected. We will respond to all such requests within one month. You can also ask for the data to be deleted, but note that;

- We will not be able to continue to care for your child if we do not have sufficient information about them
- Even after your child has left our care, we have a statutory duty to retain some types of data for specific periods of time so cannot delete everything immediately.

If you have a complaint about how we have kept your information secure, or how we have responded to a request to access, update or erase your data, you can refer us to the Information Commissioner's Office (ICO).

\*We do need to retain certain types of data (such as records of complaints, accidents, and attendance) for set periods of time after your child ceases to be in our care, but we delete as much personal data as we can as soon as possible.



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## **DATA PROTECTION POLICY**

At Mokyklele Pupa Limited, we respect the privacy of the children attending the club and the privacy of their parents or carers. Our aim is to ensure that all those using and working at Mokyklele Pupa Limited can do so with confidence that their personal data is being kept secure.

Our Data Controller is Giedre Kurlinskaite. The Data Controller ensures that the Club meets the requirements of the General Data Protection Regulation (GDPR), liaises with statutory bodies when necessary, and responds to any subject access requests.

### **Confidentiality**

Within the Club we respect confidentiality in the following ways;

- We will only ever share information with a parent about their own child.
- Information given by parents to Club staff about their child will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our Safeguarding Policy).
- Concerns or evidence relating to a child's safety, will be kept in a confidential file and will not be shared within the Club, except with the designated Child Protection Officer and the manager.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- All personal data is stored securely in a lockable file or on a password protected computer or passcode-locked phone.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.

### **Information That We Keep**

The items of personal data that we keep about individuals are documented on our personal data matrix. The personal data matrix is reviewed annually to ensure that any new data types are included.

### **Children and parents**

We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. Once a child leaves our care we retain only the data required by statutory legislation and industry best practice, for the prescribed or recommended periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

### **Staff**

We keep information about employees to meet HMRC requirements, and to comply with all other areas of employment legislation. We retain the information after a member of staff has left our employment for the recommended period of time, then it is deleted or destroyed as necessary.



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### **Sharing information with third parties**

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g. Police, HMRC, etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the daily operation of our business, for example to run our payroll and accounts, to process on-line bookings and payments, for debt recovery. Any such third parties comply with the strict data protection regulations of the GDPR.

### **Subject access requests**

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.
- Staff and volunteers can ask to see any information that we keep about them.
- We will make the requested information available as soon as practicable and will respond to the request within one month at the latest.
- If our information is found to be incorrect or out of date, we will update it promptly.
- If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

### **GDPR**

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.

Written in accordance with the Statutory Framework for the Early Years Foundation Stage (2017): Safeguarding and Welfare Requirements: Information and records [3.68 -3.71].