



Harvard Park Policies and Procedures:

Harvard Park's Privacy notice and Statement

28. Harvard Park's Privacy notice and Statement

Introduction

When registering and becoming a part of Harvard Park, you trust us with your personal data. We are committed to maintaining this level of trust which begins with us sharing our privacy practices. This Privacy Notice explains in detail what personal data we collect, how we further use that information and how long it remains with us.

This notice applies to any user of Harvard Park's childcare services, website and social media platform. This notice also applies to those employed by Harvard Park and those over the ages of 13 whom maybe on placement within Harvard Park for any length of time.

Effective date of Privacy Notice: 25th May 2018

What do we mean by personal data?

Personal data is information relating to an identified or identifiable individual, such as yourself or your child. This includes name, date of birth, national insurance numbers, national health numbers, contact numbers, email addresses etc. We aim to collect data which is adequate, relevant and limited to what is necessary. We also aim to ensure that it is kept up to date where necessary as well as accurate. Harvard Park also ensure that any data collected is processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Who controls your personal data?

Harvard Park is responsible for collecting, processing and destroying all personal data which is required of you – this makes us the data controller. We are advised by outside agencies on the nature of the data we collect however what we choose to collect is solely down to us. Some of the personal data collected is a legal obligation.

For future reference throughout this Privacy Notice, 'we' or 'us' refers to Harvard Park as a company.

What legal basis do we rely on to process your personal data?

The privacy law in the United Kingdom requires us to have a legal basis for processing your personal data. Below is a list of the legal basis we rely on:

Consent: We rely on your consent to process your personal data in very limited circumstances such as when you provide personal data to receive publications (e.g. newsletters, reminders, and invoices), information on events and news about our company. You have the right to opt out of receiving communications at any time. This request needs to be in writing or via email. However, please note that we do not print documents off and our main form of communication is electronic.

Performance under a Contract: Most of your personal data we process is necessary to perform our obligations under a contract we have with you or your employer if you receive our service as an employee benefit. We can only provide the service to you or your dependants, if you provide us with the personal data necessary to perform the contract.

Legal Obligations: There are many laws that require us to process your personal data. We can only provide the service to you or your dependants, if you provide us with the personal data required under law. Examples include child/adult care regulations, safeguarding/health/safety regulations, tax and government funding regulations.

Legitimate Interests: In some situations, we process your personal data to pursue our legitimate interests as a business. We will only process your personal data if our legitimate interests do not materially impact your interests, fundamental rights, or freedoms. Examples include:

- If you are a prospective, current or former customer, using your contact details to follow-up either by email, post, telephone or in-person to obtain your feedback on our service offering, reasons for choosing or not choosing our services as well as your experiences with our company.
- If you are a prospective, current or former customer, using your email address to send you our newsletters, relevant documentation for registration or invoices. You have the right to opt out of receiving these communications at any time.
- Combining the demographic information of our customers such as post codes, number of children and children's ages to identify service trends, as well as for funding purposes.
- Combining the care and service information of our customers to identify learning opportunities and training needs within the company, to support the improving of our service.
- Making note of your contact calls to assist with monitoring our policies and procedures and identifying opportunities for training and development.

When do we collect your personal data?

How you interact with us, determines when we collect your personal data.

When you use our electronic services and social media:

- Engaging with us on an EyLog learning journal account or social media, may be recorded for development and/or evidence of working towards parents in partnership for outside agencies or third parties.
- Contacting us for information or customer service – email addresses or telephone numbers may be saved for future communications.
- Registering or making a reservation for our services either written or electronically.

When you contact or receive services directly:

- Contacting us for information or customer service on the telephone, email or in person – maybe saved for future communications.
- Booking a visit or appointment for one of our services – data maybe saved for future communications.
- Registering for one of our services.
- While receiving services, completing electronic and paper forms, assessments and other documentation that may be required of you.
- Making a payment – in form of a signature in some to most cases.

What personal data do we collect and process?

The main reason we collect and process your personal data is to provide, evaluate and improve our services and your experiences with us.

Information you provide voluntarily (by telephone, online or in-person):

- If you are a prospective customer, your contact details and other information necessary to fulfil your request for information will be required of you and this may be saved for future communications.

If you are a customer, when registering for our services or during the course of receiving our services:

- For child/adult care services, types of personal data may include your: personalised registration user name and password for DBS systems and EyLog systems; personal and work contact details- proof of identity records such as driver's licence or passport, dependant's details such as birth certificate, name, date of birth, gender, allergies, food restrictions, special needs, health information, and emergency contact details for doctors and alternative carers and payment details.

Information we create/process when you use our services:

- For all our services, we create records during the course of providing services to you or your dependants such as notes from meetings/calls.

- Records created during child/adult care include notes or the completion of forms recording activities and behaviours such as illness, sleep, nappy changes, medication, learning, interactions with others, and accidents/incidents.
- For childcare we take photographs of children to share with their parents and as part of their learning journey records.
- For child / adult care, pictures taken are used for displays as well as on social media where consent is given.
- Utilisation information, such as dates of service, type of service, user of service and reasons for service.
- Social media username and public comments/feedback on social media so that we can respond to comments, questions or feedback.

Information from third parties:

- If you receive our service as part of an employee benefit, we may receive personal data from your employer on your eligibility to use the service and other reporting identifiers.
- If you receive government funding, we receive personal data from the government on your eligibility for the funding and other reporting identifiers.
- Government agencies may provide us with personal data to support their regulatory obligations or investigations.

Why does Harvard Park collect personal data?

We limit the collection of personal data to what is necessary to provide you with high-quality services, to support your requests, and to meet our business needs in connection with other services. We do not sell your personal data to any third parties. Below we have highlighted our reasons for collecting your personal data:

- Respond adequately to your requests for services or to provide information.
- Provide services to individuals, families and employers that include childcare and education (general, higher and accredited education), wellbeing and work/life support, and consulting.
- Provide a safe, healthy, and environment for those to whom we provide services.
- Provide resource material/information regarding our services and areas of interest to our customers, such as parenting childcare, adult care, education, wellbeing, and work/life balance.
- Aid in the administration of our services to our customers.
- Administer first aid, emergency and other medical care, when necessary.
- Act in accordance with laws, and government regulations/standards.
- Support with education, training, curriculum, communication, administration, and record-keeping.
- Provide utilisation reports and other information to employers offering our services as an employee benefit.
- Facilitate and process payments for the services.
- Fulfil tax, reporting, and other financial requirements and obligations.

- Prevent or detect unlawful acts.

Where does Harvard Park process and store your personal data?

Electronic Information:

Although some personal data may remain on electronic storage data systems in the country on site or at the Day Nursery premises in Feltham , it may also be stored in the form of a hard copy whilst your child is still attending or an adult is still employed or on placement within Harvard Park. All electronic documents are stored on an external hard drive which is kept in a locked drawer and only accessible to management. Documents relating to children/adults who have previously used our services, are stored on an external hard-drive linked to our computers which are protected via passwords and is backed up regularly.

Hardcopy Information:

The hardcopy of personal information we collect remains in the country on site where you receive the services or provide the information. These are in locked storage cupboards in offices which are then locked when the last person leaves the building. Only managerial personnel have keys to these cupboards.

Who does Harvard Park share your personal data with?

We consider your personal data confidential and do not share it with others except as described in this privacy policy. There are limited circumstances that require us to disclose your personal data to others in order to deliver services, or to meet our legal obligations. Examples include:

Your Employer: our services are often made available to you as an employee benefit. In order to meet our obligations with your employer, we provide details of your use of the services, which may include your name, dates of use, reasons for use, and other employer-requested utilisation details. We disclose only information relevant to the utilisation of the services or necessary for their administration of the benefit.

Outside Agencies: on occasion and with your signed consent, we may have to share personal data with outside agencies such as Speech and Language therapies or Child Development Clinic. Copies of these agencies privacy notices are available on request. Where we feel a child/adult may be at significant risk or harm we have a legal obligation to supply personal data without consent.

Meet Legal Requirements: We share personal data if 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 terms of use. For example, the government may require us to disclose personal data for national security or law enforcement purposes. This includes information to receive funding.

How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected and as required under law. At the end of that retention period, your data will either be permanently deleted (electronically) or shredded (hardcopies).

What rights do you have over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- To ask for copies of your personal data, please complete our Data Subject Access Request Form, which is available on request.
- For your personal data to be removed from our systems – this is known as the right to erasure. Please note that any data we need for legal obligations will have to remain with us. You do not have a right to erasure over this data.

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

- If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the relevant data protection regulator: Information Commissioner's Office at www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites.)

How do we protect your personal data?

We utilise appropriate technical, administrative and physical safeguards to protect your personal data we collect in both physical and electronic format. We provide training to our staff and conduct periodic quality assurance audits. However, no computer system or information can ever be fully protected against every possible hazard including floods or fires. As a result, Harvard Park cannot guarantee the security and privacy of the information you provide to us.

Will this Privacy Notice change?

This privacy policy is subject to change and we will keep you posted of any revisions via email. This privacy policy was last updated in July 2018 and revised in November 2022 – no changes were made.

Questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Global Privacy Officer who will be pleased to help you:

Email us at info@harvardparkdaynursery.co.uk or info@harvardparkpreschool.co.uk

For more information please look at <https://ico.org.uk> for further information

This policy was created by Harvard Park.

Date this meeting was held on 07/11/2022

Signed on behalf of the Directors and Proprietors ***Nicki Saunders and Tracey Milstead***