



DATA PROTECTION POLICY (GENERAL DATA PROTECTION REGULATION COMPLIANT) AND PRIVACY NOTICES

At Fusion Childcare Services, we respect the privacy of children attending our setting and the privacy of their parents/carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at Fusion, can do so with confidence that their personal data is being kept secure.

Fusion is Registered with the Information Commission's Officer (ICO) under the Data Protection Act 1998 and 2018 and we are General Data Protection Regulation (GDPR) compliant and the DUAA- Data (Use and Access) Act 2025. Fusion's Registration Certificate Reference number is **Z2963300** and Fusion's Data Protection Officer / Data Protection Controller is **ABIGAIL WILKINS** who is ultimately responsible for ensuring that Fusion meets all legal requirements and responds to any subject access requests.

At Fusion we handle personal data relating to a living individual who can be identified from that information, ie Name and DOB. We also hold Sensitive Personal Data which is any data that can be used in a discriminatory way, ie: religion, ethnicity, medical conditions, behavioural needs, (anything that can be viewed as information that can be used to bully). At Fusion data is held in both electronic and/or paper format.

Our lawful basis to process data is **Legitimate Interest** and annexed to this policy is our **Legitimate Interest Assessment (LIA)**, which details how, where and why we hold certain data. Further annexes to this policy are **Privacy Notices**.

In this policy data deletion means that Paper data that is no longer required is erased 2 months after the end of the academic year and Electronic data is erased 2 years after the child/ren's attendance has ceased. After this period of time we will delete your personal data unless there is a legitimate business reason to retain all or parts of the data we hold.

Data Protection Law: The Data Protection Act 1998 and Data Protection Act 2018 and GDPR compliancy describes how organisations such as Fusion Childcare Services must collect, handle and store personal information. This Policy is to comply with both the Law

and Good Practice of Fusion and respect individual rights and will include: Staff, Individual Children and Families of Fusion.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

This Policy applies to information held at/by:

- Fusion's 'Head Office' at 45 Cranbourne Drive Harpenden Hertfordshire AL5 1RJ.
- 'On Site' locations at the Grove Infant and Nursery School and The Grove Junior School Dark Lane Harpenden Hertfordshire AL5 1QD
- All Staff and Volunteers of Fusion
- All Contractors, suppliers and other people working on behalf of Fusion.

This Policy supports and protects Fusion from data security risks, including:

- **Breaches of Confidentiality:** For instance, information being given out inappropriately. If a serious breach occurs, Fusion will notify ICO within 72 hours from becoming aware of the breach. We understand there is no allowance for weekends or bank holidays.
- **Failing to offer choice:** For instance, all individuals should be free to choose how Fusion uses data relating to them
- **Reputational Damage:** For instance, Fusion could suffer if hackers successfully gained access to sensitive data
- **Breach of Security:** For instance, allowing access to data by someone unauthorised

Responsibilities: Fusion Childcare Services recognise that there may be issues that arise which are sensitive and should not be discussed in an open forum. Management, Staff and volunteers are expected to maintain confidentiality about all issues relating to individuals, families, children and staff contracted by Fusion Childcare Services. Data Protection forms part of staff's induction.

There will be times when staff will discuss particular issues within a staff meeting or other meetings, but these are not to be discussed outside the meeting/setting. The Management will also discuss matters relating to staff and these discussions will also be kept to the confines of the meeting/setting.

Fusion recognises that personal information is given to us for specific reasons only and we take our duty of care regarding confidentiality very seriously. All records are kept confidential and secure on and off site.

Everyone who works for Fusion has a responsibility for ensuring data is collected, stored and handled appropriately. Each staff member that handles personal data must ensure that is handled and processed in line with this Policy, Data Protection Principles and Data Protection Registration Requirements.

Data will only be shared with third parties for the safety and well-being of the children in our care. We will only share information about a child/ren 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 (eg Police, HMRC, etc). If we decide to share information without parental consent, it will be accurate and up to date information and we will record this in the child's file, clearly stating our reasons. Our primary commitment is to the safety and well-being of the children in our care.

Confidentiality: See Statement of Confidentiality Policy

At Fusion we respect confidentiality in the following ways:

- We will only ever share information with a parent/carer about their own child.
- Information given by parents/carers to Fusion 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 Fusion, except with the DSL and the relevant staff/volunteers
- Staff/volunteers only discuss individual children for purposes of planning and group management.
- Staff/ volunteers 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 and fireproof cupboard, on a password protected computer / passcode-locked phone.
- Students or DofE students who are on work placements and volunteers are informed of our Data Protection policy and are required to adhere to it

Right to Erasure: We will only delete photos/digital images and videos from our website, promotional material and Facebook page if it is reasonable to do so and is not going to

involve disproportionate effort. We refuse to destroy any data that we must hold for statutory reasons, such as Health and Safety and Safeguarding data and there might be times when we refuse to comply with a request for erasure for certain reasons.

Data that Fusion collects is to protect the interests of parents/carers/children/staff and we ensure we are not using data in ways that are deemed as intrusive or which could cause harm unless we have very good reason.

Subject Access Request: Parent's/carers/children/staff have a right to request and see all of their data that Fusion holds about them. Fusion will provide the requested information in easy formats such as PDF/XLS/CSV or as soon as practicable or within 30 days (whichever is the sooner) If our data is found to be incorrect or out of date, we will update it promptly.

Parents/carers can ask us to delete data, but this may mean that we can no longer provide care to the child, as we have a legal obligation to keep certain data. In addition, even after a child has left our care, we have to keep some data for specific periods, so won't be able to delete all data immediately. Similarly, Staff/ volunteers can ask us to delete their data, but this may mean that we can no longer employ them, as we have a legal obligation to keep certain data. In addition, even after a staff member has left our employment, we have to keep some data for specific periods, so won't be able to delete all data immediately. 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).

Data Storage and destruction: Fusion's data is held within an individual Registration Pack or Update Data Collection Sheet which is in paper format and is stored on site securely in a locked fireproof cabinet; staff personnel records are also stored in this way.

A copy of all the above paper format data is further stored at Fusion Head Office and/or on Fusion's Secure Electronic Database. This electronic data is protected from unauthorised access, accidental deletion, and malicious hacking attempts. We use strong passwords that only the Management of Fusion have access to; copies of personal data are never transferred to personal computers or other devices; all servers and computers used by Fusion are protected by a firewall and security/ encryption software.

Once a child/parent/carer/staff/volunteer/visitor has left Fusion, their data will be held for 2 months after the current academic year has ended and a further 2 years thereafter. After which, all data will be destroyed unless the data is regarding Health & Safety and Safeguarding purposes. When Fusion retains data that is relating to Health & Safety /Safeguarding, it will not be shared unless required by Law. Any electronic data will be deleted after the referred to time period and removed from the recycle bin which will also be emptied at this time. Paper data will be shredded using a crosscut shredder within the referred to time period. Any personal and payroll data forms part of HMRC requirements and will be kept for legal reasons.

Data Protection Complaints Procedure

This section outlines the internal privacy complaint procedure for Fusion Childcare Services.

In order to comply with our obligations under the GDPR and DUAA, and in order to deliver a high level of service to our families, this procedure explains how Fusion Childcare Services receives, investigates, responds to and records complaints relating to the processing of personal data in compliance with the UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025 (DUAA).

This procedure applies to any complaint from an individual who believes that the organisation has not complied with data protection law in relation to their personal data.

Examples include complaints about:

- The use or disclosure of personal data.
- The handling of a Subject Access Request (SAR).
- Data retention practices.
- Marketing communications.
- Data accuracy.
- Security incidents or data breaches.
- Failure to uphold an individual's data protection rights.

How Complaints May Be Received: Individuals may submit a data protection complaint through any reasonable channel, including:

- Email
- Website contact form
- Post
- Telephone
- In person
- Via an authorised representative

Staff recognise that a complaint does not need to mention "GDPR", "DUAA" or "data protection law" to qualify as a data protection complaint.

Roles and Responsibilities: All staff members who receive a data protection complaint must:

1. Record the complaint immediately.
2. Forward it to the Data Protection Lead within one working day.
3. Preserve any relevant records.

Data Protection Lead: The Data Protection Lead is responsible for:

- Logging complaints.
- Acknowledging complaints.
- Conducting or overseeing investigations.
- Coordinating responses.
- Maintaining complaint records.
- Identifying lessons learned and corrective actions.

Complaint Handling Procedure:

Stage 1 – Receipt and Logging

Upon receipt of a complaint:

- Record the date received.
- Allocate a complaint reference number.
- Log the complaint in the Data Protection Complaints Register.

Stage 2 – Acknowledgement: The organisation will acknowledge receipt of the complaint within 30 calendar days of receiving it. The 30 days start the day after we receive the complaint. It doesn't matter if this day falls on a weekend or a public holiday. The 30 days still start on this day. If the last day to acknowledge the complaint falls on a weekend or public holiday, we have until the next working day to provide an acknowledgement. We can acknowledge sooner, before the 30 days expire. There is no obligation to outline a timeframe for responding.

The acknowledgement will:

- Confirm receipt.
- Provide a complaint reference number.
- Explain the investigation process.
- Provide contact details for further enquiries.
- Legally the acknowledgement must be responded to within **30 days** of receipt.

We will:

- Check content of complaint relates to the correct company and is potentially a relevant issue.

- Verify the complainant's identity. If we have any doubts about the complainant's identity, we may need to ask them for proof of ID before we respond. We will make sure we ask for it at the earliest opportunity. If we have sufficient information to be satisfied about the requester's identity, we will not request more information.
- Ensure that we have enough information to fully investigate and respond.
- We will not make assumptions about what we think the issue is about.
- We will ask for more information if needed.

Stage 3 – Investigation: Fusion Childcare Services will begin investigating the complaint without undue delay.

The investigation may include:

- Reviewing relevant records and systems.
- Interviewing relevant staff.
- Consulting processors or third parties where necessary.
- Reviewing policies and procedures.
- Assessing compliance with applicable legislation.

The extent of the investigation will be proportionate to the nature, complexity and potential impact of the complaint.

Stage 4 – Progress Updates: Where the investigation cannot be concluded promptly, the complainant will be kept informed of progress.

Updates should normally be provided at least every 30 days until the matter is resolved, and we will send fortnightly updates in order to adhere to our legal obligation to keep complainant updated. We will send updates even if there is little to report.

Stage 5 – Outcome: Once the investigation is complete, we will provide a written outcome without undue delay.

The response will include:

- A summary of the complaint.
- The findings of the investigation.
- Any corrective action taken or proposed.
- Any explanation where the complaint is not upheld.
- Information about the individual's right to complain to the Information Commissioner's Office (ICO).

Right to Escalate: If the complainant remains dissatisfied, you may complain to the Information Commissioner's Office (ICO).

Website: www.ico.org.uk

Telephone: 0303 123 1113

The organisation will provide ICO contact details in all final complaint responses.

Record Keeping: The Data Protection Complaints Register must record:

- Complaint reference number.
- Date received.
- Date acknowledged.
- Nature of complaint.
- Investigation actions undertaken.
- Outcome.
- Date closed.
- Any lessons learned or corrective actions.

Complaint records will be retained for six years from closure unless a longer retention period is required by law.

Adopted on:	Last reviewed on:	Reviewed on:	Next review Date:
04.01.14	01.09.2025	09.07.2026	April 2027
<i>Written in accordance with the Statutory Framework for the Early Years Foundation Stage (2025): Safeguarding and Welfare Requirements: Information and record keeping [3.92 -3.95], information about the child [3.96]..</i>			
Signed and approved:	Fusion Childcare Services		

Privacy Notice for Parents/Carers:

Once you have read and understood this policy as well as the LIA, there is a section in the Registration Pack/ Data Collection Sheet for you to sign giving permission for us to contact you and how.

At Fusion Childcare Services we respect the privacy of the children attending Fusion and of their parents/carers. The personal information that we collect about you and your child/ren 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/ren is so that we can fulfil our contract with you. Our legal condition for processing any health-related information that you provide about your child is so that we can provide appropriate care for that child. See below table.

At Fusion, we take protecting online privacy and data security seriously. Please read the whole of this statement carefully as it sets out our approach to processing personal data including what information we may collect from you, how we may use it, store it and protect it, and your rights as a data subject.

Under General Data Protection Regulations, we are required to ask you to give us permission to contact you. As you have chosen for your child/ren to use our services, we will use the contact details you give us to contact you via phone/text, email, social media and Royal mail post so that we can send you information about your child, Fusion and other relevant news, and also so that we can communicate with you regarding payment of your fees.

Data processing principles: Our Privacy Statement outlines our approach to any kind of data processing where we are acting as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons.

This statement applies to our processing of data collected through any means, actively as well as passively, from persons located anywhere in the world.

We are guided by the following principles when processing data:

1. We will only collect data for specific and specified purposes;
2. We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required;
3. We will collect and use your personal information only if we have sensible business reasons for doing so, such as making available to you our services and products;
4. We will not use your data for purposes other than those for which it was collected, accepted as stated within our policy, or with your prior consent;
5. We will seek to verify and/or update your data periodically and we will accept requests from you for amendment of the data held;

6. We will apply high technical standards to make our processing of data secure;
7. Except otherwise stated, we will not store data in identifiable form longer than is necessary to accomplish its purpose or as required by law.

As per our Data Processing Principles we will only ask for information that is necessary to deliver our services, and therefore we encourage you not to provide us with personal data or special category data which we do not ask for.

Any information that you provide is kept secure for the child/ren you have parental responsibility for. Paper data that is no longer required is erased 2 months after the end of at the end of every academic year. Electronic data is erased 2 years after your child/ren's attendance at Fusion has ceased.

We will only share personal information about you or your child/ren with other organisations if we:

- have a safeguarding concern about your child
- for medical purposes
- are required to by government bodies or law enforcement agencies
- have obtained your prior permission.

How we store and transfer your information: 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 can't delete everything immediately.

We may store or process your data on cloud based platforms or service providers whose servers are based outside of the UK/EEA which may constitute a transfer of data under GDPR. We will only use such third party service providers where we are confident that appropriate safeguards are in place to ensure that any personal data transferred outside of the UK/EEA is subject to an equivalent level of security and protection as required under UK Data Protection Legislation.

We have in place appropriate technical and organisational measures to ensure the security, confidentiality, integrity and availability of personal data we control. Your information is securely stored on our database, Xero and cloud storage and mailchimp, which is not publicly accessible or stored in any public domain – it is accessible to our Management only and is password protected. Our third-party providers have their own privacy policies which you can view on their websites.

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).

What information we collect: In accordance with Data Protection Legislation we only collect and process information which we require to meet the specific purposes as stated above. See below table.

How we collect, use and share personal data: Most personal information is provided directly and voluntarily by you when you engage with us. We will collect information from you via our registration pack/data collection sheets and book children in or when you contact us via email or phone or when you post on social media. We collect this information in order to make available to you our services or products and to communicate with you in relation to our services or products. We may use the information collected to:

1. Allow us to process a booking
2. Create a profile for you on our database
3. Send you our newsletters and/or provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
4. Respond to enquiries you make
5. Ask you to take part in surveys
6. Notify you about changes to our provision
7. Get feedback from you regarding the quality of our provision .

We will not sell or lend your personal data to third parties, or share your personal data for marketing purposes without your express consent. We will only share your personal data with third party service providers where it is necessary for the delivery of our products or services, and only where we are confident that and such third party service providers have appropriate data protection systems and measures in place that are compliant with UK Data Protection Legislation.

We will not give consent to third party service providers or platforms to use your information, including audio and video recordings, for purposes other than those for which the information was collected and which are necessary for the delivery of our products and services. We will not give consent for your information to be used by third party service providers for the training and development of AI modelling software, or similar purposes.

We have in place appropriate procedures to handle any potential Personal Data Breaches, in accordance with Data Protection Legislation. Any such breaches will be reported to the relevant supervisory authority and notified to the affected data subjects where we are legally required to do so.

Legal basis for processing your data

The General Data Protection Regulation (GDPR) provides that processing of your data shall only be lawful if and to the extent that at least one of the following applies:

1. You have consented;
2. For the performance of a contract;
3. For compliance with a legal obligation which we must perform;
4. To protect the vital interests of your or another person;
5. It is in the public interest;
6. It is in the legitimate interests pursued by us or a third party.

We collect data for the purposes set out above. All personal data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons or minimised and retained.

Any special category data collected from you has special protection and is limited to that permissible by law. In all instances where special category data is collected we will obtain your express consent.

Your legal rights as a data subject: You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting us using the details at the end of this statement. These rights include:

1. the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you. If you wish to access your personal data please email us at the address provided in this statement;
2. the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) to do so;
3. in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data that you have provided to us;
4. the right to request that we correct your personal data if it is inaccurate or incomplete;
5. the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we must retain it;

6. the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we must refuse that request;
7. the right to lodge a complaint with the applicable data protection regulator, in the UK this is the Information Commissioner's Office (ICO).
8. when we are processing on the grounds of legitimate interest, you have the right to object to the processing, and we must stop unless we have an overriding reason which will be communicated to you.

You have the right to ask to see the data that we have about yourself or your child/ren, 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/ren if we do not have sufficient information about them
- even after your child/ren has left our care, we have a statutory duty to retain some types of data for specific periods of time, so we can't delete everything immediately.
- We can only delete data if it is reasonable to do so.

Links from our website: Our Site contains links to and from other websites which are operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies. We do not accept any responsibility or liability for these policies. We advise you to check the policies for third party sites before you submit any personal data to the website.

Marketing emails: We may send you marketing emails and communications when you have opted in or otherwise given consent for us to do so. We will make it as easy as we can for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the primary service you have requested.

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by emailing admin@fusionchildcareservices.co.uk.

Cookies and website analytics: We use website analytics to provide the best user experience and service to you and to evaluate and improve our site. We utilise third party data analytics service providers to improve our visibility and to monitor website browser behaviour and navigation across our site.

These third-party data analytics service providers collect this information using cookies on our behalf in accordance with our instructions and in line with their own privacy policies. Our

service providers may collect the following data about the way you use our Site, which will almost always be anonymised and aggregated before reporting back to us:

1. Number of visitors to our Site;
2. Pages visited whilst using the Site and time spent per page;
3. Page interaction information, such as scrolling, clicks and browsing methods;
4. Source location and details about where users go when they leave the Site;
5. Page response times and any download errors;
6. Technical information relating to end user devices, such as IP address or browser plug-in.

If you wish to limit or reject cookies associated with our website you can do this in your browser settings. Please be aware that by choosing to limit or reject cookies from our website may mean you may not be able to use or benefit from certain features, particularly the features designed to personalise your experience.

Changes to our policy & future processing: We do not intend to process your personal information except for the reasons stated within this Privacy Statement. We reserve the right to update this Privacy Statement from time to time. Where appropriate, we shall contact you via newsletter/ parent board to notify you of any material changes to the Privacy Statement. You should also refer to our website periodically so that you may access and view our updated Privacy Statement. This will ensure that you understand how we are using your personal data and your legal rights around our usage of such personal data.

If you have any questions or concerns regarding our data protection or privacy policies, please contact us admin@fusionchildcareservices.co.uk and we will be happy to respond to any concerns.

Should you still have concerns about the way in which we manage your personal data then you should contact the relevant supervisory authority, which in the UK is the Information Commissioner's Office: [Contact us](#) | [ICO](#)

Privacy Notice for Staff/Volunteers:

At Fusion we respect the privacy of our employees and volunteers. The personal information that we collect about you is used only to manage your employment or volunteering with us and to meet the relevant requirements of Employment and Childcare Legislation. Our legal basis for processing your personal information is to fulfil our legal obligations as an Employer. employment and childcare legislation.

Our lawful basis for processing your information

We rely on more than one lawful basis, depending on the information concerned: the performance of your contract with us (for example to pay you and to manage your employment); our legal obligations as an employer and childcare provider (for example tax and HMRC requirements, and the vetting checks we are required to carry out); and our legitimate interests (for example obtaining references and keeping appropriate records).

Where we process information about your health, this is “special category” data; our condition for processing it is meeting our obligations under employment law, and we keep an Appropriate Policy Document as required by the Data Protection Act 2018. Where we process information about criminal convictions and offences, in particular your Disclosure and Barring Service (DBS) check, our lawful basis is our legal obligation to ensure that people working with children are suitable to do so, together with the safeguarding condition in Schedule 1 of the Data Protection Act 2018, and we keep an Appropriate Policy Document for this data as well

Information we collect for recruitment and safer recruitment checks- see below table

As part of recruiting you and employing you safely, and to meet our safer recruitment duties as a childcare provider, we collect and process:

- your application form or CV, and our record of any interview;
- proof of your identity (this is not photocopied, but is seen) and your right to work in the UK;
- references from previous employers, including confirmation of your suitability to work with children;
- an enhanced DBS check, including a check of the children's barred list, and, where relevant, your status on the DBS Update Service;
- your self-declaration that you are not disqualified from working in childcare, and any prohibition or other suitability checks that apply to your role;
- your qualifications and training records;
- information about your health where it is relevant to your role or to any reasonable adjustments.

During your employment we also keep records such as your contract, payroll and timesheets, holiday, training, appraisals, and any grievance or disciplinary matters.

How long we keep your information: Any information that you provide to us is kept secure whilst you are in our employment, and data that is no longer required is erased after you leave our employment. We retain Personnel Folders for up to 5 years after your employment at

Fusion has ceased for Health and Safety, Safeguarding and Employment and HMRC reasons and some records for longer where the law requires it (for example certain accident and payroll records). Recruitment records for candidates who are not appointed are kept only for a short period and then securely destroyed. We delete or destroy personal data once we no longer need it.

Contacting you: We will use the contact details you give us to contact you via phone, text, email, social media and Royal Mail post so that we can send you information about your employment and other relevant Fusion related news.

Sharing your information: We will only share personal information about you with other organisations if we:

- have a safeguarding concern that relates to you; or
- are required to by government bodies or law enforcement agencies; or
- have obtained your prior permission.
- need to share information with the DBS, Ofsted or other authorities as part of our vetting and safeguarding duties; or
- provide a reference about you to a prospective employer or other body, where you have asked us to act as a referee; or
- with our accountants and bookkeepers to process data on our behalf (eg to process our payroll)

Your rights: You have the right to ask to see your personal data 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 please note that:

- we will not be able to continue to employ you if we do not have sufficient information about you
- even after you have left our employment, we have a statutory duty to retain some types of data for specific periods of time* so we can't delete everything immediately.

How to raise a concern or complaint: If you are unhappy with how we have handled your personal data, including how we have kept it secure or how we have responded to a request to access, update or erase it, you have the right to complain to us directly in the first instance. If you remain dissatisfied after complaining to us, you can then complain to the Information Commissioner's Office (ICO).

Once you have read and understood this policy as well as the LIA, please sign and date below to confirm that you have read the policy and Privacy Notice and that you give permission for us to contact you regarding relevant matters.

Signed: _____ Date: _____

Name: _____

** We do need to keep certain types of data (such as accident and wage records) for set periods of time after your employment ends, but we delete as much personal data as we can as soon as possible.*

Legitimate Interest Assessment – GDPR

When we refer to Electronic Data we mean Fusion's database/email system which is secured with strong passwords and when we refer to Paper Data we mean Registration Packs, Update Forms and other physical documents which are stored in a fireproof lockable cupboard.

Data Type	Format Electronic (E) Paper (P)	Purpose	Do we need it?	Who might we share it with?
Parents/children- information from the registration pack. Retained: Electronic data is stored for 2 years after leaving Fusion and Paper data is shredded 2 months after the end of the academic year. Incident/Accident forms/safeguarding, H&S records are retained for 10 years due to statutory obligations.				
Full Name, Preferred Name, DOB and Sex	E / P	So we know about the child.	Yes	Staff, School county, other professional service like Children's Services and Police.
Year group	E / P	So we know which year group the children are in, so where we know where to collect them	Yes	Staff, teachers, county
Ethnic Origin, Home Language, religion, nationality	E / P	Can offer support and make an inclusive environment and best support children. Also need this data for county records.	Yes	County Staff Department of Education
Opt in about which payment method parents will be using	E / P	So we know about payments and can track and chase.	Yes	Management only
Address and Email address, phone numbers 4 emergency contacts	E / P	So that we can contact parents/emergency contacts. Documents ie emails and letters and we use phone contact numbers for during the sessions.	Yes	Staff, Social Services, Police
Parent's place of work (company) as well as work number	P	Terrorism- Incase we cannot get hold of parents (phone lines are down), we can see if their place of work has been affected 'lock down'.	Yes	Staff only.
Family Password	E / P	For safeguarding purposes so we only release children to the adult only if they know the password.	Yes	Staff only but parents provided it
Medical Information; Dietary needs, Allergies, Medication , Permission to administer forms, Health and Medical Conditions Communication needs, Toileting , Mobility Behaviour	E / P	So we can support the child daily: give them correct food, have the medication they require, alter our communications methods, offer additional support and put interventions and plans in place to support them. We also need this information if we have to take children to hospital or if we have to phone 111.	Yes	Staff, social services, emergency services, other education professionals involved in the child's care.

Information about the children: Likes, Dislikes, Important people in their lives, Celebrations they celebrate , Any other information	P	So we know the children, settle and help them making it a welcoming and inclusive environment. We can ensure that we are celebrating the festivals they celebrate, can get toys out to make them feel comfortable and ensure that we are not doing anything they dislike.	Yes	Staff and any other professionals
Children signing behaviour code	P	So we know that children are aware of our behaviour policy and we know they will conduct themselves appropriately.	Yes	Staff and parents
Consent for children to do things (opt in process- YES or NO): -Photos/digital images and videos to be used for website and promotional material. -Photos/digital images and videos to be used for our open Facebook page. -Photos/digital images and videos to be used for internal proposes, ie notice boards. -Emergency treatment -Taking children off site -Watching DVD's -Have Facepaint -Use electronic devices.	E / P	We need this information so that we can respect the parents/families wishes and so that we are abiding by their consent.		Staff, Emergency services, ie hospital/ medical professionals. Photos/digital images and videos to be shared with people who visit our website, come across any promotional material, ie leaflets, videos, anyone who is part of our Facebook page and anyone who sees any internal communications, ie noticeboards and photo albums. Consent about face-painting will be shared with the Face painter
Parents signature and confirmation that they have read and understood Fusion's policies and procedures.	P	So we know that parents are knowledgeable about the running and organisation of Fusion and will act appropriately in accordance with our policies. Forms part of contract between parents and Fusion and gives consent that parents/carers have read our policies and procedures	Yes	Parents
Registers	E / P	So we know who attended and who picked up and timings of arrival and departure	Yes	Management, staff, parents and Accountant
Incident/accident forms	P	For H & S purposes and to pass onto parents/carers	Yes	Staff, parents, kept for legal purposes if needed. HR
Observation sheets/ All about me/ Unique summaries for Reception children	P	To show we meet Early Years Framework Statutory requirements and to show development of children.	Yes	Ofsted, parents, staff for training purposes, teachers and other professionals involved in a specific child

General correspondence/ communication; text/email/written	E/P	So we have records of communication	Yes	Management, with staff, parents
Database which contains all the above info as well as payment, invoice amounts, childcare providers	E	To have a coherent accounts package and a coherent information/record about the child/family	Yes	Management and parents know their own details
Staff/Volunteers/Visitors (all data paper and electronic, ie personnel folders are retained for 5 years from the end of the Employment due to Employment obligations) Data about candidates: unsuccessful candidates who were interviewed we retain data for 2 months; other unsuccessful candidates: disposed of immediately.				
Full name, address, contact details, sex, marital status (personal details) including Application form and employment history.	E / P	To contact staff; ie post payslips, email courses, references, briefings, day to day communication, next of kin information, medical and well-being of staff	Yes	Management, internal HR
Bank details, NI number, P45, payroll, time sheets	E / P	To pay staff and comply with HMRC obligations	Yes	Management, Bank, HMRC, Tax and national insurance, NEST pension provider, Accountants,
DBS info-proof of identity/address, address history and update service numbers.	E / P	We do not keep a record such as photocopies of DBS certificates and ID, but we see them and record the DBS certificate number. We also hold staff's update service number to check their DBS but we ask permission before we do so.	Yes	Capita- the DBS company we use. Management and the member of staff who's update service number it belongs too.
Health Information -Medical Conditions Which surgery they are registered at	P	Awareness of staff's medical info and any consequences/impact. Also need for 111 or 999/hospital.	Yes	Management and hospital/medical professionals. Other staff.
Supervisory and Appraisals	P	HR and reflect on targets and see training opportunities.	Yes	Management and HR and staff who they belong too
CPD evidence such as certificates	P	So we know when to renew staff training and what development we can provide them with	Yes	Staff who belong too, Management
Employment info: ie interview sheet, induction, policy confirmation, references, contracts, confirmation slips, pay rise letters, grievance and disciplinary and any other correspondence	E / P	For safer recruitment, so we have records of staff.	Yes	Management, HR and staff who they are about