



GDPR and Data Protection Policy

Written by: Louise Lloyd-Evans

Last Review Date: May 2026

Next Review Due: May 2027

Policy Statement

Young Friends Kindergarten is committed to protecting the privacy, dignity and confidentiality of all children, families, staff and visitors.

We understand that families place enormous trust in us when sharing personal information relating to themselves and their children. We take this responsibility extremely seriously and are committed to handling all data safely, lawfully, ethically and professionally.

This policy outlines how we collect, use, store, protect and share personal data in accordance with:

- UK GDPR
- The Data Protection Act 2018
- The EYFS Statutory Framework
- Safeguarding and welfare requirements
- ICO guidance

Young Friends Kindergarten is registered with the Information Commissioner's Office (ICO).

ICO Registration Number: Z3448614

Our Values

At Young Friends Kindergarten, data protection is part of our wider culture of professionalism, safeguarding and respect.

Our approach reflects our core values:

- Respect for the privacy and dignity of children and families
- Authenticity and transparency in communication
- Supportive leadership with clear systems and accountability
- Sustainability through careful and responsible handling of information
- Community built on trust, professionalism and confidentiality

We believe families should feel completely confident that information relating to their children is handled with exceptional care.

Applicability

This policy applies to:

-
- Children
- Parents and carers
- Staff
- Students and apprentices
- Volunteers
- Visitors
- External professionals and agencies

Purpose

This policy explains:

- What information we collect
- Why we collect it
- How we store and protect it
- Who information may be shared with
- How long information is retained
- Individual rights under GDPR
- How we manage photographs and images
- Procedures relating to data breaches

What Information We Collect

To fulfil our safeguarding, legal and operational responsibilities, Young Friends Kindergarten collects and stores information including:

Children's Information

- Full name
- Date of birth
- Home address
- Birth certificate information
- Attendance records
- Medical information and allergies
- Dietary requirements
- Safeguarding information
- SEND records and reports
- Medication and accident records
- Learning and development observations
- Funding information
- Emergency contact details

Parent and Carer Information

- Names
- Addresses
- Telephone numbers
- Email addresses
- National Insurance numbers where required for funding

-
- Funding eligibility information
- Court orders or legal documentation where applicable
- Payment and invoicing information

Staff Information

- Contact details
- Emergency contacts
- Qualifications and training records
- DBS information
- Right to work documentation
- Payroll and banking information
- Employment records
- Relevant health information
- Supervision and appraisal records
- Recruitment documentation and references

Visitor Information

- Names
- Contact details where appropriate
- Company details
- Purpose of visit
- Signing in and safeguarding records

Why We Collect Information

We collect and process information in order to:

- Safeguard children
- Meet legal and EYFS requirements
- Deliver high quality care and education
- Support children's health and wellbeing
- Communicate with families
- Process funding applications
- Maintain safe staffing and recruitment procedures
- Work with external agencies where necessary
- Fulfil safeguarding responsibilities
- Manage operational and financial processes

We only collect information that is necessary, proportionate and relevant.

How We Store and Protect Information

Young Friends Kindergarten takes strong measures to ensure all information is stored securely and confidentially.

Our systems include:

- Password protected devices and accounts

-
- Secure management cloud storage systems
- Restricted access depending on staff role and responsibility
- Password protected Family accounts
- Locked storage for any temporary paper documents
- Secure deletion and destruction procedures
- Ongoing review of unnecessary or outdated data

Paper copies of documents are scanned securely and uploaded to protected management storage systems before being returned or securely disposed of where appropriate.

Only authorised staff members can access confidential information, and staff understand that confidentiality is an essential professional responsibility.

Family and Digital Communication

Family is our primary communication platform for families. It is used for:

- Daily communication
- Observations and learning updates
- Invoices and funding information
- Messages and announcements
- Child records and documentation

Email and telephone communication may also be used where appropriate.

Calls may be recorded for safeguarding, quality assurance or training purposes.

Once families leave the Kindergarten and contractual obligations are complete, unnecessary communication records are deleted in accordance with retention guidance.

Photographs, Videos and Images

Young Friends Kindergarten uses photographs and videos carefully, respectfully and professionally to document children's experiences, celebrate meaningful learning and communicate the unique nature of our provision with families and the wider community.

As a sustainability-led Kindergarten, much of what makes our provision special is deeply visual and experiential. Children engage daily in gardening, cooking, repairing, nature exploration, woodworking, animal care, loose parts play and authentic real-life learning experiences that are intentionally different from many mainstream settings.

It is important for families considering Young Friends Kindergarten to understand and see the nature of our environment, curriculum and ethos. Carefully selected photographs help us communicate our values, attract like-minded families and sustain our unique provision. Sharing aspects of our practice is therefore an important part of our business and community model.

However, protecting children's privacy, dignity and safety always comes before marketing or promotion. We intentionally take an extremely cautious and privacy-conscious approach to photography.

At Young Friends Kindergarten:

-
- We do not publicly share identifiable images of children
- We do not use children's faces on social media, marketing materials or public platforms, even when blurred
- Photographs used publicly usually show hands, feet, backs, silhouettes, clothing, activities or close-up experiences rather than identifiable features
- Images are carefully selected to protect the anonymity, dignity and privacy of all children and families
- Children's names are never attached to publicly shared photographs
- Staff do not use personal devices to take, store or share photographs of children
- Images are only used in line with parental permissions and safeguarding expectations

Our aim is always to celebrate childhood, sustainability and authentic learning experiences while protecting the privacy and safety of every family within our community.

Storage and Security of Images

Young Friends Kindergarten takes image security extremely seriously.

Staff use designated Kindergarten iPhones for photographs and observations. These devices are used solely for professional purposes relating to the Kindergarten.

To maintain security:

- Images are uploaded to a secure shared cloud storage system used only by Young Friends Kindergarten
- The shared cloud system is accessible only through authorised Kindergarten devices
- Photographs are deleted from devices as soon as they have been securely uploaded
- Images therefore exist in only one secure location rather than across multiple devices
- Staff do not retain photographs on phones or personal accounts
- Devices are password protected
- Phones are stored in a locked cupboard within a locked office outside working hours
- Access to image storage systems is restricted to authorised staff only
- Staff receive guidance relating to confidentiality, safeguarding and GDPR responsibilities regarding image handling

We recognise that photography permissions require trust, and we are committed to maintaining exceptionally high standards of professionalism, confidentiality and image security.

Confidentiality and Professional Conduct

All staff are expected to maintain strict confidentiality regarding children, families and colleagues.

Staff must:

- Never discuss confidential information outside professional necessity
- Never share information inappropriately with other parents or external parties
- Ensure records are handled respectfully and securely
- Use professional judgement when handling sensitive information
- Follow safeguarding procedures where information sharing is legally required

Confidentiality obligations continue after employment ends.

Information Sharing

.

We may share information where legally required or professionally necessary, including with:

- Brighton and Hove City Council
- Ofsted
- Safeguarding agencies
- Health professionals
- Schools and receiving settings
- SEND support services
- Payroll and employment providers
- DBS processing services

Information is only shared securely, lawfully and where necessary.

Where possible, consent will be obtained before information is shared unless safeguarding or legal obligations override this.

Data Retention

Young Friends Kindergarten retains records only for as long as legally necessary and in accordance with statutory guidance, safeguarding responsibilities and operational requirements.

Examples include:

- Child records are retained for a minimum of 3 years after a child leaves the Kindergarten
- Accident and injury records are retained until the child reaches 21 years of age
- Child protection and safeguarding records are retained until the child reaches 24 years of age
- Staff employment records are retained for 6 years after employment ends
- Recruitment records for unsuccessful applicants are securely destroyed after an appropriate retention period
- Financial records are retained in line with HMRC requirements

Once retention periods expire, records are securely deleted, destroyed or anonymised.

Individual Rights Under GDPR

Individuals have the right to:

- Be informed about how their information is used
- Access their personal information
- Request correction of inaccurate information
- Request erasure where legally appropriate
- Restrict processing
- Object to certain uses of data
- Request data portability
- Challenge automated decision-making where applicable

Requests relating to personal data will be responded to within one month unless legal exemptions apply.

Data Breaches

Young Friends Kindergarten takes all data breaches seriously.

•

A data breach may include:

- Loss of confidential documents
- Unauthorised access to information
- Information being shared incorrectly
- Lost devices containing personal information
- Cyber security incidents

Any breach involving personal data will be:

- Reported immediately to management
- Investigated promptly
- Recorded appropriately
- Reported to the ICO where legally required
- Communicated to affected individuals where necessary

Staff are expected to report concerns immediately.

Data Protection Lead

Young Friends Kindergarten has an appointed Data Protection Lead responsible for overseeing GDPR compliance, staff awareness and data protection procedures.

Current Data Protection Lead: Claudia Chapman.

Responsibilities include:

- Monitoring GDPR compliance
- Supporting staff understanding and training
- Reviewing systems and procedures
- Managing data protection concerns
- Supporting breach reporting procedures
- Ensuring secure data handling practices remain up to date

Staff Training and Responsibilities

All staff receive guidance regarding:

- Confidentiality
- GDPR responsibilities
- Secure handling of information
- Safeguarding and information sharing
- Appropriate technology use
- Password and device security
- Safe image handling procedures

Staff understand that data protection is everyone's responsibility.

Website and Cookies

Our website may use cookies and analytics to improve user experience and understand website usage. Any analytical data collected is anonymised and used appropriately.

•

Families may unsubscribe from marketing communication at any time.

Relevant Policies

- Safeguarding Policy
- Acceptable Use of Technology Policy
- Communications Policy
- Images and Photography Policy
- Staff Code of Conduct
- Confidentiality Policy

External Organisations

- Information Commissioner's Office (ICO)
- Ofsted
- Brighton and Hove City Council

Authorisation

Louise Lloyd-Evans
Owner and Director
Young Friends Kindergarten
89 Holland Road
Hove
East Sussex
BN3 1JP