

Wolfson College - Nurseries - Record of Processing Activity

ID	Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
1	Information about attendees' health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.	We obtain this data from you We generate this data about you Third party	When we consider what reasonable adjustments to make or we need to take account of any dietary requirements attendees have (whether for medical or belief reasons), or where there is a medical emergency, and any decisions that we take as a result.	We retain this information for the duration of our contract with you. The information is held in order to ensure you are provided with foods meeting your personal requirements, and in order that we can make appropriate and reasonable adjustments to the service and facilities we offer. The information will be deleted within 3 months of the end of that contract.	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law, and/or food safety law.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with obligations under the Equality Act 2010 and/or pursuant to health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equal opportunity and to make reasonable adjustments, and to comply with its health and safety obligations.	N/A	
2	Information about service users' ethnicity, health, religion or belief and/or sexuality.	We obtain this data from you Third party	For equality monitoring purposes and in relation to attendees personal development.	Equality monitoring information will only be held and processed in anonymised form. This anonymised information will be kept in perpetuity in an anonymised form for College records and monitoring purposes. To the extent that such information is held in relation to attendee development records, complaints handling, correspondence with service users, and accident and similar records, please review the entries specific to such categories of records to identify the expected retention period.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College and its service users have a legitimate interest in monitoring and promoting equality of opportunity.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for equality of opportunity or treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	
3	Service user's contact details (name, current and historic addresses, telephone numbers)	We obtain this data from you Third party	In order to be able to contact service users and create appropriate records in relation to the service provided to each. This information is also used following the end of a contract for nursery provision, in order to provide notification of nursery celebrations and/or for fundraising purposes. Finally, this data is held for Local Authority auditing purposes.	The majority of generic contact records are held for 7 years following the end of the contract for provision of nursery services. Where this information is held in registers, medication records, accident books pertaining to children, and similar materials, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records, in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in communicating with current and former service users, for the purpose of marketing (including fundraising). We also have, depending on circumstances, a legal obligation or a legitimate interest in being able to properly respond to and engage with audits of our services.	N/A	N/A		
4	Security records, including CCTV records and access records. Records of security incidents, accident reports and health and safety records.	We generate this data about you	To monitor the attendance of people on (College) premises, as part of the College's safety and security arrangements.	CCTV records, access control and access logs are retained for six months . Security incident logs, accident reports, and health and safety records which do not involve a child are held for at least 6 years from their creation. Such reports may be sent to the Governing Body of the College, in which case copies will be retained in the College archive indefinitely. Security incident logs, accident reports, health and safety records, and similar materials pertaining to children, are held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records, in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We are required by child protection and safeguarding legislation to control and monitor access to nursery premises. In addition, the College has a legitimate interest in monitoring the attendance of individuals on College premises as part of safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	Special category data retained in such records may be held on a variety of bases, including that it is necessary for reasons of substantial public interest in the exercise of a function conferred by enactment or a rule of law, or to protect the public.	The processing is necessary in connection with legal proceedings (including prospective legal proceedings) The processing is necessary for the purpose of obtaining legal advice The processing is otherwise necessary for establishing, exercising or defending legal rights The processing meets a condition in Parts 1-3 of Schedule 1 to the Data Protection Act 2018	To the extent that the data held concerns criminal offence/allegation information. The basis for such processing will typically be the prevention or detection of an unlawful act.

5	Records of nursery life: photographs and written records of events, activities, performances and similar.	We generate this data about you	To maintain a record of nursery events and activities, and to produce appropriate EYFS statutory framework records.	Records must be kept for a reasonable period following the point at which the attendee leaves nursery provision (under the EYFS Foundation Stage requirements/Childcare Act 2006). We consider that a period of 3 years fulfils this requirement.	Processing is necessary for performance of our contract with you Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of nursery activities and in marketing nursery facilities and services.	N/A		N/A	
6	Computer and email information, including parent site usernames and passwords, IP addresses of devices you connect to College IT systems, details of when you connected or logged in to our network, and usage logs. This includes certain login records for online learning journal services.	We generate this data about you	To enable you to access the parent pages of the nursery website, and monitor site and network usage.	IP addresses, access logs and similar will be retained for one year after it is generated. Login records will be held for one year following the end of the contact for nursery provision.	Processing is necessary for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	Parents, staff and attendees have a legitimate interest in having a focal point for child activity records, parent/nursery communications and similar matters.	N/A		N/A	
7	Correspondence with service users	We obtain this data from you We generate this data about you	To hold an accurate record of our communications with you.	Correspondence will be held for up to 7 years following the end of the contract for provision of nursery services. Where this information relates to registers, medication records, accident books pertaining to children, and similar materials, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records, in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	Service users and those parts of the College engaged in nursery services provision have a legitimate interest in the availability of an accurate record of communications between the various parties over time.	N/A		N/A	
8	Biographical information of attendees, including their interests, habits, family details, nationality, culture and achievements.	We obtain this data from you We generate this data about you Third party	As part of each nursery attendee's profile to enable appropriate care and education, in line with legal obligations, to be provided.	Attendee progress records are passed to those with parental responsibility when the attendees stop attending. The majority of data continuing to be held by the nursery will be held for 3 years following the end of the contract for provision of nursery services or until after the next OFSTED inspection, whichever is sooner. Where this information is included in records of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for performance of our contract with you. Processing is necessary for compliance with a legal obligation	Substantial public interest under the UK Data Protection Act 2018	To the extent that special category data is processed, the processing is necessary for the provision of early years education, and provision of equality of opportunity and/or treatment. Such processing is necessary to avoid the commission of unlawful acts under the Equality Act 2010, and /or under health and safety law.	N/A		
9	Financial information including bank/building society account numbers, sort codes, credit/debit card numbers, childcare vouchers, childcare entitlements, invoices and outstanding payment information.	We obtain this data from you We generate this data about you Third party	As part of taking payments (including deposits and balances) for childcare provided, calculating fees and entitlements, issuing invoices and pursuing outstanding amounts.	Records will ordinarily be retained for 7 years from the date they are created. In cases where payment is outstanding, retention periods may be extended to accommodate recovery proceedings.	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract		N/A		N/A	
10	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	We generate this data about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	This data will be retained for up to 7 years from the termination of the contract for provision of nursery services, unless there is a compelling justification for the data to be retained for a longer period, e.g. in connection with legal advice, or in relation to auditing obligations.	Processing is necessary for compliance with a legal obligation	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under law. Such processing is also necessary to avoid the commission of unlawful acts under the relevant legislation.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. Such processing is also necessary to avoid the commission of unlawful acts under the relevant legislation.	

11	Opinions and comments made by service users regarding nursery provision, as expressed in communications with the nursery (to the extent recorded)	We obtain this data from you	The views and concerns of service users help to guide the management of the nursery provision.	To the extent that this data is considered in management discussions and papers, copies will be retained in the College archives permanently. Other instances of this data will be retained for up to 6 years following the date of record. Where this information is included in records of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in proactively managing our nursery provision.	N/A		N/A	
12	Application paperwork, including copies of birth certificates and/or passports, and details of requested hours.	We obtain this data from you	As part of enrolling attendees for nursery provision.	Data for unsuccessful applicants will be retained for a maximum of 1 year. Data for attendees will be retained for up to 6 years following the end of the contract for nursery provision.	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract		Substantial public interest under the UK Data Protection Act 2018	To the extent that the data is special category data, we process it in accordance with obligations imposed by law.	N/A	
13	Next of kin/emergency contact data	We obtain this data from you Third party	To enable us to contact appropriate individuals in the event that attendees are injured, become unwell, or there other relevant cause for concern regarding their well-being.	Until the end of the contract for nursery provision.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	It is in the interests of service users' legitimate interests for us to have the means to contact a family member or other designated representative in a situation where there is significant concern for an attendee's welfare.	N/A		N/A	
14	Learning and development records, including copies of attendee's creative efforts, discussions with parents/guardians, individual learning plans, projections and progress records.	We generate this data about you	As part of the provision of the EYFS framework and/or of appropriate and stimulating care.	Attendee learning records are passed to those with parental responsibility when the attendees stop attending. The majority of data continuing to be held by the nursery will be held for 3 years following the end of the contract for provision of nursery services or until after the next OFSTED inspection, whichever is sooner.	Processing is necessary for performance of our contract with you Processing is necessary for compliance with a legal obligation		N/A		N/A	
15	Complaints and related investigations raised with the nursery and relating to nursery provision, including records of any investigation and/or decision that we take, and of any subsequent appeal of resolution.	We obtain this data from you We generate this data about you Third party	To ensure that complaints are dealt with in an appropriate and timely manner, resolved, and that lessons learned and suggested improvements are acted upon.	Complaint records are held by the nursery will be held until after the next OFSTED inspection, whichever is sooner. Where this data is included in records of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for performance of our contract with you. Processing is necessary for compliance with a legal obligation. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	All parties have a legitimate interest in the correct and proper handling of complaints. We also have legal obligations under legislation pertaining to childcare to keep appropriate records and provide materials to inspectors.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under law, and/or such processing may also be necessary to avoid the commission of unlawful acts under the Equality Act 2010. Processing may also be necessary for the exercise, establishment or defence of legal claims.	N/A	
16	Intervention and behavioural management records.	We generate this data about you	As part of the provision of appropriate, child-focused care.	The data is held by the nursery for 3 years following the end of the contract for provision of nursery services or until after the next OFSTED inspection, whichever is sooner. Where this information is included in records of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	Processing is necessary for performance of our contract with you Processing is necessary for compliance with a legal obligation	We are required by law to keep appropriate records and make those available to inspectors where required to do so.	N/A		N/A	

17	Attendance records	We generate this data about you	We monitor attendance at the setting as part of financial management, staffing planning and also in accordance with our child protection and welfare obligations.	We hold this data for 6 years following the end of the contract for provision of nursery services.	<p>Processing is necessary for performance of our contract with you.</p> <p>Processing is necessary for compliance with a legal obligation.</p> <p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We have a legitimate interest in monitoring usage of the nursery service. We also have a legal obligation to track the attendance of service users, where they use state-funded childcare schemes.</p>	N/A	N/A	
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