



Confidentiality Policy and Privacy Notice

Last Reviewed: 21/08/2025

Next Review: 21/08/2026

1.0 Policy Statement

Shooting Stars Nursery treats all personal information about children, families and staff as confidential. We collect only what we need, keep it secure, share it lawfully and proportionately, and retain it only for as long as necessary. Confidentiality is central to trust with our families and to safeguarding children. Where a concern for a child's safety arises, the welfare of the child is paramount, and information may be shared with appropriate agencies without consent if necessary.

2.0 Our Legal Obligations

UK GDPR & Data Protection Act 2018: lawful, fair and transparent processing; data minimisation; accuracy; storage limitation; integrity and confidentiality; accountability; data subject rights.

EYFS Statutory Framework (2025): maintain required records (e.g., child records, accidents/incidents, complaints) and share information with parents and Ofsted on request; notify Ofsted of defined serious incidents.

Working Together to Safeguard Children (2023): information-sharing principles; share without consent where needed to protect a child.

Common law duty of confidentiality: disclose only on a lawful basis (consent, vital interests, legal obligation, public task/legitimate interests).

Health & Safety / RIDDOR / Insurers' requirements: accurate incident records and appropriate retention.

Equality Act 2010: non-discriminatory handling of information and reasonable adjustments.

3.0 Procedures

How we use information (summary):

We hold: identification and contact details; attendance, learning and wellbeing information; health/medical details and care plans; safeguarding records; funding and fee information; staff HR and vetting data. We use this to deliver care and education; meet legal duties (EYFS, safeguarding, health & safety, funding/finance); communicate with parents; manage staffing; and improve our service.

Lawful bases:

We rely on one or more of: performance of a contract with parents; legal

obligation (EYFS/safeguarding/H&S); vital interests (to protect life); legitimate interests (day-to-day operations); and, where required, consent (e.g., certain photos/marketing). Special category data (health) is processed under the substantial public interest/health bases.

Confidentiality in practice:

Access to records is restricted to those who need to know to perform their role (e.g., key person, Room Leader, Manager/DSL, SENCO, admin). Staff must not discuss children, families or colleagues outside professional contexts, in public spaces, or on personal devices/social media. Paper files are locked; digital records are stored in password-protected systems with role-based access and regular backups. We never give out information by phone/email unless we have verified the caller/recipient and it is lawful to do so.

Information sharing:

We share information only when necessary and lawful, for example with parents/carers, the Local Authority(funding/safeguarding), health professionals (with consent or where vital interests apply), the LADO/Children's Social Care/Police for safeguarding, Ofsted (on request or notifications), insurers/HR/payroll, and IT service providers acting under contract as data processors. We keep a record of significant disclosures.

Subject access and privacy rights:

Parents (and older children where appropriate) may request access to their personal data. We will respond within one month (extensions only where permitted). Individuals have rights to rectification, erasure (where applicable), restriction, objection, and data portability (limited contexts). Identification may be required to process requests. Some records (e.g., safeguarding files) may be restricted or shared in redacted form where law requires.

Retention:

We keep records only as long as needed to meet legal, regulatory, insurer and safeguarding requirements. Typical periods include:

- Child records (general): at least 3 years after the child leaves.
- Accident/incident records: up to when the child reaches 21 years and 3 months (insurer best practice).
- Safeguarding records: retained in line with local safeguarding partnership/insurer guidance (potentially to age 25).
- Complaints: at least 3 years after closure.

Data breaches:

We maintain a breach procedure. Any suspected loss, unauthorised access or disclosure must be reported immediately to the Manager. Where risk to individuals is likely, we will notify the ICO within 72 hours and affected individuals without undue delay.

Training and compliance:

All staff, students and volunteers receive confidentiality and data protection training

during induction and regular refreshers. Breaches of this policy may lead to disciplinary action and, if appropriate, referral to external authorities.

Privacy Notice (who we are & contacts):

- Data Controller: Shooting Stars Nursery (Nursery Manager acting on behalf of the Provider).
- Contact for data requests/concerns: info@shootingstarsoldham.com /07478370470/394 Lees Road, Oldham, Greater Manchester, OL4 5EP.
- Right to complain: You may complain to the Information Commissioner's Office (ICO) if you remain unhappy after contacting us.

4.0 Roles and Responsibilities

Nursery Manager: overall compliance and responding to requests.

DSL: oversees safeguarding information sharing and secure storage of safeguarding files.

All staff/volunteers: keep information confidential, secure and only share on a need-to-know lawful basis.