



# Data Protection & Confidentiality Policy

Bijou Day Nursery & Crèche, Cowbridge

**Policy owner:** Nursery Manager / Rheolwr y Feithrinfa

**Version:** 2.0

**Last reviewed:** June 2026 / Mehefin 2026

**Next review:** June 2027 / Mehefin 2027

**Approved by:** Samantha Rennison, Responsible Individual / Unigolyn Cyfrifol

## 1. Policy Statement

Bijou Day Nursery & Crèche is committed to protecting the privacy and confidentiality of all personal information we hold about children, families, staff, and visitors. We handle all personal data lawfully, fairly, and transparently in compliance with data protection legislation.

This policy complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Child Minding and Day Care (Wales) Regulations 2010 (as amended), and the National Minimum Standards for Regulated Childcare (2016). Our ICO registration details are available on request.

## 2. Data Controller

Bijou Day Nursery and Creche Ltd (Company No. 11468667) is the data controller. The Responsible Individual, Samantha Rennison, has overall accountability for data protection compliance.

## 3. What Data We Collect

CATEGORY	EXAMPLES
Child information	Name, date of birth, address, medical/dietary information, development records, photographs
Parent/carer information	Names, addresses, contact numbers, email, emergency contacts, workplace details
Staff information	Employment records, DBS details, training records, payroll information
Visitor information	Sign-in records

## 4. Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Contract:** To fulfil our childcare agreement with parents
- **Legal obligation:** To comply with CIW regulations, safeguarding duties, HMRC requirements

- **Legitimate interests:** To operate the nursery safely and effectively
- **Consent:** For photographs, marketing communications, and information sharing with third parties not covered by the above bases

## 5. Confidentiality

---

- All staff sign a confidentiality agreement as part of their employment contract
- Children's records are stored securely — physical files in locked cabinets, digital files on password-protected systems
- Information about children and families is shared on a need-to-know basis only
- Staff do not discuss children or families outside the nursery setting
- Confidentiality is maintained during handovers — sensitive information is shared privately, not in front of other parents
- Volunteers, students, and supply staff are bound by the same confidentiality requirements

## 6. Data Sharing

---

We share personal data only when required by law or with explicit parental consent. Organisations we may share data with include:

- CIW (regulatory requirement)
- Local Authority (safeguarding, Flying Start, early years funding)
- Schools (transition information, with parental consent)
- Health professionals (with parental consent, unless safeguarding)
- HMRC (Tax-Free Childcare, childcare vouchers)

We will **always** share information without parental consent if it is necessary to safeguard a child — see our Safeguarding Policy.

## 7. Data Retention

---

- Children's records are retained for a reasonable period after the child leaves — details are set out in our retention schedule
- Accident/incident records are kept in line with statutory requirements
- Staff records are retained in line with HMRC and employment law requirements
- Data no longer needed is securely destroyed (shredding for paper, secure deletion for digital)

## 8. Parents' & Staff Rights

---

Under the UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Request — responded to within one calendar month)
- Rectification of inaccurate data
- Erasure (where there is no legal obligation to retain)
- Object to processing or restrict processing in certain circumstances
- Data portability
- Lodge a complaint with the ICO

## 9. Data Breaches

---

- Any suspected data breach is reported to the Nursery Manager immediately
- The Responsible Individual is informed and investigates
- If the breach is likely to result in a risk to individuals' rights, it is reported to the ICO within 72 hours
- Affected individuals are notified if there is a high risk to their rights
- CIW is also notified of any significant data breach

## 10. Staff Training

---

- All staff receive data protection and confidentiality training during induction
- Annual refresher training is provided

## 11. Related Policies

---

- GDPR & Privacy Notice
- Camera & Mobile Phone Policy
- E-Safety & Online Safety Policy
- Safeguarding & Child Protection Policy