

PN038 – EARLY YEARS PRIVACY NOTICE

Torfaen County Borough Council is committed to protecting your privacy when you use our services. This Privacy Notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards in place to protect it.

TCBC Service Area:	Education
Work area:	Early Years
Contact Details:	Emma Treadgold
Privacy Notice Name:	Early Years

Data Controller:

Torfaen County Borough Council
C/o Civic Centre
Pontypool
NP4 6YB

If you wish to raise a concern about the handling of your personal data, please contact the Data Protection Officer using the details below;

Data Protection Officer:

Susan Bullock
01633 647467
Email: dpa@torfaen.gov.uk

The Council needs to process data to be able to provide a service to meet you and your family’s individual needs e.g. administering funding for the free entitlement of childcare.

By collecting your data it enhances the ability of Torfaen County Borough Council to co-ordinate assessment and support across agencies to provide a more seamless response to your needs and ensures that you benefit from the range of interventions and services provided.

1) Who provides your data to the Council?

The personal information we process is provided to us directly by you for administration and statistical purposes. The information is used to discuss and co-ordinate the most appropriate services to support your child and/or family’s needs.

Data may also be collected via CCTV if you visit Blenheim or Cwmbran Integrated Children’s Centres. CCTV may also be captured at other Integrated Children’s Centres that share sites with schools that have CCTV.

AND

We receive personal information indirectly from professional panel and meeting discussions if appropriate to your family. You will be notified in advance of these discussions.

2) How does the Council collect this information:

- Registration forms
- Childcare FS1 application forms
- Childcare Foundation Phase Profiles
- Request for Service Forms
- WellComm Assessments
- Professional Meetings and Discussions
- Via CCTV at Blenheim and Cwmbran Integrated Children’s Centres.

3) What information does the Council collect about you?

The Early Years Team collects a range of information about you. This includes:

- Child name
- Child date of birth
- Child address
- Gender
- Contact details
- Parents/Carers/Guardians name
- Parents/Carers/Guardians address
- Parents/Carers/Guardians date of birth
- Medical details of either child and/or parent/carer
- Video footage of visitors to Blenheim and Cwmbran Integrated Children’s Centres
- Child developmental assessments

4) Why does the Council process your personal data?

Under Article 6 of the UK General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information is:

- (e) We need it to perform a public task

Please note we may ask for consent to engage in the service or for the sharing of information with providers, however, consent is not the legal basis we rely on to process your personal data.

5) **Special categories of personal data:**

We collect the following special category data;

- personal data revealing racial or ethnic origin
- data concerning health

Video footage from CCTV may also collect the following special category data;

- personal data revealing religious or philosophical beliefs
- data concerning a person's sexual orientation

We collect this under Article 9 of the UK GDPR.

We do not ask you to provide any criminal data directly however it may be captured in CCTV footage. We process this under Article 10 of the UK GDPR.

6) **Who has access to your data?**

Your data is shared internally only with the appropriate staff where it is necessary for the performance of their roles. Our Shared Resource Service (SRS) monitor CCTV footage and you can view their privacy notice [here](#).

Your data may also be shared externally with organisations that support the Early Years programme where it is necessary for the performance of their roles. These may include, but not be limited to;

- Aneurin Bevan Health Board
- Flying Start Childcare Settings
- Tafarn Newydd
- Primary Schools in Torfaen
- CCTV footage identifying criminal behaviour may be shared with the Police.

Your data is also used to report on the Early Years' service provision to relevant stakeholders such as Aneurin Bevan University Health Board and Welsh Government. In reporting on the service provision, individual data is anonymised. It is necessary to share data with Welsh Government as it is in the public interest to monitor the performance of grants such as Flying Start and we have a legal basis for doing so as the providers of this grant. This data is anonymised by a trusted third party, Digital Health and Care Wales and provided to the Secure Anonymised Information Linkage databank to carry out research on behalf of Welsh Government, Torfaen County Borough Council and the Health Board.

Apart from where previously stated, we do not pass your details to third parties unless we are lawfully required do so.

Is the Data transferred out of the UK?

No

7) How does the Council keep your data secure?

The Council has internal policies in place to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. Access to this data is restricted in accordance with the Council's internal policies and in compliance with the UK GDPR.

Data will be stored securely in;

- Database
- Password protected documents
- CCTV footage is stored on a secure network

Where the Council engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

8) How long does the Council keep your data?

The Council will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. At the end of the retention period the Council will securely destroy or dispose of the data in line with retention schedules.

- **We will keep your information for 7 years unless your information has been passed under a statutory duty in which case the information is kept for 25 years.**
- **CCTV footage is overwritten on a continuous basis unless there is a need to retain it.**

9) Are we making automated decisions/profiling with your data?

No

Your rights

You have a number of Rights you can exercise:

- Access - to obtain a copy of your data on request
- Rectification – to require the Council to change incorrect or incomplete data

- Object, Restrict or Delete - under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Data portability – to receive and/or transmit data provided to the Council to other organisations (this applies in limited circumstances)
- Withdraw your consent at any time (where consent has been given)
- To know the consequences of failing to provide data to the Council
- To know the existence of any Automated Decision-making, including profiling, and the consequences of this for you.
- To lodge a complaint with a supervisory authority (Information Commissioners Office)

If you would like to exercise any of these rights, please contact; Early Years ABS Hub, earlyyearsABSHub2@torfaen.gov.uk , 01495 742101

The Information Commissioner can be contacted at: The Information Commissioner's Office (Wales), 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH. Telephone 0330 414 6421 or e-mail Wales@ico.org.uk.

