



Data Protection & Confidentiality Policy

Document Control

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Policy Owner	Data Protection Lead
Applies To	All employees, managers, apprentices, students, volunteers, agency staff, contractors and directors
Related Documents	Privacy Notice, Cookie Policy, CCTV Policy, Photography & Recording Policy, Safeguarding & Child Protection Policy, Records Retention Schedule, Personal Data Breach Procedure

Policy Statement

New Beginnings Day Nurseries is committed to protecting the privacy, confidentiality and security of the personal information entrusted to us by children, parents, carers, employees, volunteers and visitors.

Families place their trust in us by sharing personal and, in many cases, sensitive information so that we can provide safe, high-quality childcare. Protecting that information is fundamental to safeguarding children, maintaining confidence and meeting our legal responsibilities.

We are committed to processing personal information lawfully, fairly and transparently, ensuring that information is collected only where necessary, kept accurate, stored securely, shared appropriately and retained only for as long as required.

Confidentiality is central to the professional relationships we build with children, families and colleagues. However, confidentiality will never prevent New Beginnings from sharing information where there is a legal obligation to do so or where sharing information is necessary to safeguard a child or another individual from harm.



Purpose

The purpose of this policy is to ensure that New Beginnings:

- protects the personal information entrusted to us;
- complies with UK data protection legislation;
- maintains high standards of confidentiality;
- supports effective partnership working with parents and professionals;
- enables appropriate information sharing where required to safeguard children;
- ensures employees understand their responsibilities when handling personal information; and
- maintains secure systems for collecting, storing, sharing and disposing of personal information.

This policy should be read alongside the nursery's Privacy Notice, which explains to parents, employees and visitors how personal information is collected and used.

Scope

This policy applies to everyone working for or on behalf of New Beginnings Day Nurseries, including:

- Directors
- Managers
- Employees
- Apprentices
- Students
- Volunteers
- Agency staff
- Contractors
- Professional visitors

The policy applies to all personal information processed by the nursery, regardless of format, including paper records, electronic records, emails, learning journals, photographs, CCTV footage and information held within approved nursery management systems.

Roles and Responsibilities

Managing Director



The Managing Director has overall responsibility for ensuring that appropriate arrangements are in place to protect personal information and comply with data protection legislation.

This includes ensuring that:

- appropriate policies and procedures are maintained;
- sufficient resources are available;
- compliance is monitored; and
- information governance forms part of the nursery's wider governance arrangements.

Data Protection Lead

The Data Protection Lead is responsible for:

- overseeing compliance with data protection legislation;
- providing advice and guidance to managers and staff;
- responding to data protection enquiries;
- coordinating Subject Access Requests;
- managing personal data breaches;
- reviewing policies and procedures; and
- promoting good information governance throughout the organisation.

Managers

Managers are responsible for:

- ensuring employees understand this policy;
- monitoring compliance within their nursery;
- ensuring confidential information is stored securely;
- reporting actual or suspected data breaches immediately;
- ensuring staff receive appropriate training.

Employees, Students and Volunteers

Everyone working within New Beginnings must:

- maintain confidentiality at all times;
- only access information necessary for their role;
- keep personal information secure;
- follow nursery policies and procedures;



- report any actual or suspected data breach immediately;
- protect the privacy of children, families and colleagues.

Failure to comply with this policy may result in disciplinary action.

Data Protection Principles

The way New Beginnings collects, uses, stores and shares personal information is guided by the principles set out within the UK General Data Protection Regulation (UK GDPR). These principles underpin all of our information governance arrangements and help ensure that personal information is handled responsibly, consistently and with respect for the rights of children, families, employees and visitors.

When processing personal information, New Beginnings will ensure that it is:

Lawful, Fair and Transparent

Personal information will only be collected and used where there is a lawful basis to do so. We will be open and transparent about how information is used and will provide individuals with clear information through our Privacy Notice and other relevant communications.

Collected for Specific Purposes

Personal information will only be collected for legitimate nursery purposes, including the delivery of childcare, safeguarding, employment, legal obligations and the effective management of the nursery. Information will not be used for unrelated purposes unless permitted by law.

Adequate, Relevant and Limited

We will only collect and retain the personal information that is necessary to fulfil the purpose for which it has been obtained. We are committed to ensuring that information collected is proportionate and appropriate.

Accurate and Up to Date

We will take reasonable steps to ensure that personal information is accurate and kept up to date. Parents, employees and other individuals are encouraged to notify the nursery promptly of any changes to their personal information so that our records remain accurate.

Retained Only for as Long as Necessary

Personal information will only be retained for as long as required to meet legal, regulatory and operational requirements. Once information is no longer required, it will be securely archived or disposed of in accordance with the nursery's Records Retention Schedule.



Kept Secure

Appropriate technical and organisational measures are in place to protect personal information against accidental loss, unauthorised access, disclosure, alteration or destruction. This includes secure electronic systems, restricted access to information, password protection, staff training and secure disposal arrangements.

Processed Responsibly and with Accountability

New Beginnings is responsible for demonstrating compliance with data protection legislation. We regularly review our policies, procedures and working practices to ensure that personal information continues to be managed lawfully, securely and in accordance with current legislation and regulatory guidance.

Confidentiality

Everyone working within New Beginnings has a professional responsibility to maintain confidentiality.

Staff Responsibilities

Confidential information must only be accessed where it is necessary to fulfil an employee's role and must never be discussed with anyone who does not have a legitimate need to know.

Information must not be discussed:

- in public places;
- with family or friends;
- on social media;
- outside the workplace unless authorised.

Working with Parents

We believe that effective partnerships with parents are built on openness and trust.

Parents can expect that personal information relating to their child or family will be treated with respect, handled sensitively and only shared where there is a lawful basis to do so.

We also ask parents to respect the privacy and confidentiality of other children, families and employees whilst attending nursery events or engaging with nursery activities.

Safeguarding and Confidentiality



Whilst confidentiality is extremely important, the welfare of the child will always be our paramount consideration.

Where we believe a child may be at risk of harm, or where required by law, information may be shared with appropriate agencies without consent in accordance with safeguarding legislation and the nursery's Safeguarding & Child Protection Policy.

Information Sharing

New Beginnings will only share personal information where there is a lawful basis to do so.

Information may be shared where:

- consent has been provided;
- sharing is necessary to fulfil our contractual or legal responsibilities;
- safeguarding concerns require information to be shared;
- there is a legal obligation to disclose information;
- sharing is necessary to protect the vital interests of an individual.

Information will only be shared with organisations or professionals who have a legitimate need to receive it and only the information necessary for that purpose will be disclosed.

Information Security

New Beginnings takes appropriate technical and organisational measures to protect personal information.

These include:

- password-protected devices and systems;
- role-based access to electronic records;
- secure storage of paper records;
- confidential waste disposal;
- encrypted communications where appropriate;
- regular software updates and security measures;
- staff training on confidentiality and data protection.

The nursery uses approved systems to support the delivery of its services, including:

- **Parenta** – website hosting.
- **Famly** – learning journals, activity logs, invoicing, booking patterns for children, accident and incident forms, staff shifts and parent communication.
- **PMX ParentMail** – communication with parents and carers.
- **Funding Loop** – administration of early years funding.
- **Signable** – secure electronic signatures and document management.



- **Local authority funding systems**-claiming funding on behalf of children attending the nursery

These providers process personal information on behalf of the nursery under appropriate contractual arrangements and are expected to comply with UK data protection legislation.

Confidential Waste

Paper records containing personal information will be disposed of securely using confidential waste arrangements.

Electronic records will be securely deleted in accordance with the nursery's Records Retention Schedule.

Training and Awareness

All employees receive appropriate training in data protection and confidentiality as part of their induction.

Training is refreshed regularly and whenever there are significant changes to legislation, guidance or nursery procedures.

Managers are responsible for ensuring that employees understand their responsibilities and apply this policy consistently in their day-to-day practice.

Personal Data Breaches

A personal data breach is any incident that results in personal information being lost, accessed without authority, disclosed incorrectly, altered or destroyed.

Any employee who becomes aware of an actual or suspected data breach must report it immediately to their manager or the Data Protection Lead.

All breaches will be investigated promptly and managed in accordance with the nursery's Personal Data Breach Procedure.

Where required by law, the nursery will notify the Information Commissioner's Office (ICO) and affected individuals.

Monitoring and Review

This policy will be reviewed annually, or sooner where there are changes to legislation, statutory guidance or nursery practice.

Compliance will be monitored through:



- management oversight;
- staff supervision;
- training;
- internal audits;
- incident reviews; and
- continual improvement of the nursery's information governance arrangements.

Related Documents

This policy should be read alongside the following:

- Privacy Notice
- Cookie Policy
- Safeguarding & Child Protection Policy
- CCTV Policy
- Photography & Recording Policy
- Records Retention Schedule
- Personal Data Breach Procedure
- Subject Access Request Procedure

This policy was adopted on	Signed on behalf of the nursery	Date for review
<i>1st August 2026</i>	Joanna Wilkinson	<i>1st August 2027</i>