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Service Area:	Education
Work Area:	Early Years
Contact Details:	01443 863232 earlyyearshub@caerphilly.gov.uk
Privacy Notice Name:	Early Years Programme – Antenatal to 7 years old
Description of Privacy Notice:	This privacy notice will explain how Caerphilly County Borough Council will use the information you provide when you register for the Early Years Programme.

How we will use your information

Source and type of information being processed

Categories of personal data obtained

Caerphilly County Borough Council has obtained the following categories of your personal data:

Parent or carer details:

- Name
- Address
- Date of birth of the parent
- Email address
- Telephone number
- Mobile number
- Language preference
- Gender
- Ethnicity
- Any disabilities
- Pregnancy status
- Partner details if you have one (as above)
- Armed Forces status

Child details:

- If unborn, child's due date, name of midwife, name of GP, and parents' relationship to the child
- If born, child's name, date of birth, address, language spoken, gender, ethnicity, any disabilities, any medical issues, relationship to parent/carer and their partner if they have one
- Any siblings of the child

Source of the personal data

This information is provided to Caerphilly Early Years and Childcare Team by the parent or carer or by a professional on behalf of the parent or carer by completing one of the following online forms published on the Caerphilly Early Years and Childcare website, or by contacting the Early Years Hub:

- Antenatal and Early Years Registration Form
- Early Years Request for Support Form
- Flying Start Childcare Application Form
- JAFF / ISCAN / SPACE Referral Form

If you would like further information on the source of this information please contact Caerphilly County Borough Council. You may be required to apply for this information as a Subject Access Request.

Purpose and legal basis for using your information

Purpose of processing

When a parent registers for the Early Years programme, information will be stored on relevant secure databases and used to offer relevant services for the parent and the child / children at the relevant age / stage of their life. The services offered can include health visiting groups / home packages, parenting programmes, home-based family support, speech and language support, child development support and possible funded childcare placements depending on the needs of the child and funding criteria.

Once your child is part of the Early Years programme, relevant information necessary for the administration and delivery of the programme may be collected such as attendance data, childcare arrangements, any interventions, assessments and reports in respect of the child and family.

Additionally we may seek your consent to use photos and videos of your child for the purposes of marketing, this does not otherwise affect the Early Years programme provided.

Relevant information will be shared between the programme delivery partners, where it is necessary to provide support to the child and the family. These include Aneurin Bevan University Health Board, Caerphilly County Borough Council, childcare settings, relevant CCBC contracted organisations, and relevant schools. This may include What Matters meetings, Emerging Needs Panel meetings, SRB (Specialist Resource Base) Outreach Panel meetings and Enhanced Childcare Transition meetings, where wider professionals relevant to the family are invited.

If it is believed at any stage of the process that a child or adult may be at risk, the All Wales Safeguarding Procedures will be followed, which may result in a formal investigation and assessment. This may involve several agencies such as the police, health or education having access to your information.

Legal basis for processing

There is a public task obligation to process your information detailed below:

Well-Being of Future Generations (Wales) Act 2015, which sets seven well-being goals to show the kind of Wales we want to see and places a legal obligation on public authorities to work to achieve these goals which includes:

- A prosperous Wales
- A healthier Wales
- A more equal Wales

The Social Services and Well-being (Wales) Act 2014, which places a well-being duty on those subject to the Act to promote the well-being of –

- (a) people who need care, and
- (b) carers who need support

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

1(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. If any information falls within the definition of special category personal data then an additional condition from Article 9 of the Regulations must be identified, as outlined below:

2(g) processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

As we are relying on the substantial public interest condition in Article 9(2)(g), we must also identify one of 23 specific substantial public interest conditions set out in Part 2 of Schedule 1 of the DPA 2018, as outlined below:

6(1) This condition is met if the processing—

- (a) *is necessary for a purpose listed in sub-paragraph (2), and*
- (b) *is necessary for reasons of substantial public interest.*

(2) Those purposes are—

- (a) *the exercise of a function conferred on a person by an enactment or rule of law;*
- (b) *the exercise of a function of the Crown, a Minister of the Crown or a government department.*

Legal basis for photos and videos

If we ask to use photos or videos of your child in promotional material, we will seek your consent to do so, and for this purpose we rely on the 'Consent' lawful basis for processing from Article 6 of the Regulations as detailed below:

1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Mr Carl Evans

Corporate Information Governance Manager / Data Protection Officer
Email: dataprotection@caerphilly.gov.uk
Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

Details of main users of your information

The main user of your information is the Caerphilly Early Years and Childcare Team. However due to the nature of the programme your information may be shared with other service areas within Caerphilly County Borough Council and other partner organisations to meet the needs of your family.

Details of any sharing of your information within Caerphilly County Borough Council

Registration details and family information will be shared within the Early Years team to ensure families are offered the full Early Years programme, without having to repeat their story to different professionals, which may include:

- Administration team for sending out service invites at the relevant age / stage
- Childcare settings to invite families to sign up for childcare, depending on need
- Speech and Language team to support speech and language interventions in the home, group, childcare setting or school
- Family Support team to offer group or home based support
- Child development team to offer group or home based support

All information received is entered on the Education database and will be shared as relevant with other teams in Education including School Admissions, Additional Learning Needs officers, Education Psychology to support a child's transition into Foundation Phase Nursery / primary school.

Information may be shared with other CCBC delivery partners, including the Supporting Family Change team, if necessary.

Details of any sharing of your information with other organisations

Registration details and family information may be shared with delivery partners to ensure families are offered relevant Early Years services, including:

- Aneurin Bevan University Health Board – midwifery, health visiting team, speech and language therapy, and other therapy teams to support public health messages and interventions
- Gwent Association of Voluntary Organisations Early Language team for delivery of speech and language groups
- Parent Network to invite parents to local parent forum
- Early Years relevant registered Childcare providers to invite families to sign up for childcare
- Schools to support the child's transition to nursery and/or school
- External Families First delivery partners via a Joint Assessment Family Framework document
- Integrated Service for Children with Additional Needs (ISCAN)
- Single Point of Access for Children's Emotional (SPACE) Wellbeing and Neuro Development (ND) Panels

Your anonymised information may be shared with Welsh Government / SAIL Databank (working on behalf of Welsh Government) to produce anonymised statistical

information for the purposes of improving health, well-being and services within Wales. Further information on this project is available via their website: www.saildatabank.com/faq/

If it is believed at any stage of the process that a child or adult may be at risk the All Wales Procedures will be followed, which may result in a formal investigation and assessment. This may involve several agencies such as the police, health or education having access to your information.

Details of any external data processors

- Aneurin Bevan University Health Board
- Gwent Association of Voluntary Organisations
- Parent Network
- Relevant Contracted Childcare providers

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

The information we hold forms part of the child's Education Record and will be retained until the child's 25th birthday.

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection legislation

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints

Summary Privacy Notice

How we will use your information

The Early Years programme will use your information to offer relevant parent/child services based on your needs. Information will be shared with relevant delivery partners. Our legal basis for processing is public task, the information we hold forms part of the child's Education Record and will be retained until the child's 25th birthday.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

<https://www.caerphilly.gov.uk/caerphillydocs/foi/privacynotices/early-years-privacy-notice.aspx>