



The Butterfly Rooms (Incorporating Woodlands) LTD

Tank Hill Road | Purfleet | Essex | RM19 1TA

Registered Charity Number: 1148068 | Ofsted Number: 453859 | Company Number: 7984150 | *Limited by Guarantee*

Telephone Number: 01708 863 737

General Data Protection Regulation (GDPR) Policy

Policy Statement

The Butterfly Rooms is committed to ensuring the protection of all personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any relevant updates including the Data (Use and Access) Act 2025.

We recognise our responsibility to handle personal data fairly, lawfully, and transparently, particularly in relation to children and families in our care.

Scope

This policy applies to:

- All staff, including temporary and voluntary staff
- All personal data processed by The Butterfly Rooms
- All systems, both paper-based and electronic

Data Controller

The Butterfly Rooms is the **Data Controller**.

Data Protection Lead: Alison Bean

We are registered with the Information Commissioner's Office (ICO).

Data Protection Principles

We follow the 7 UK GDPR principles:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

Categories of Data

We process the following types of personal data:

Child Data

- Personal identification details
- Attendance records
- Learning and development records
- Health, medical, and dietary information
- SEND information
- Safeguarding records

Parent/Carer Data

- Contact details
- Emergency contacts
- Family circumstances

Staff Data

- Employment records
- Payroll and tax information
- DBS checks
- Training records

Special Category Data

We process sensitive data (e.g., health, safeguarding) under Article 9 UK GDPR:

- **Legal obligation** (childcare and safeguarding law)
- **Vital interests** (protecting a child's life)
- **Safeguarding purposes** (substantial public interest)

Lawful Basis for Processing

We process data under:

- **Legal obligation** – complying with EYFS and safeguarding requirements
- **Public task** – providing education and childcare
- **Vital interests** – protecting children
- **Contract** – delivering agreed childcare services
- **Consent** – for optional activities (e.g., photos)

Consent can be withdrawn at any time.

Data Collection and Use

We collect personal data to:

- Deliver childcare and education
- Ensure safeguarding and welfare
- Monitor development (EYFS requirements)
- Communicate with parents
- Administer funding schemes
- Support transitions to school

Data Sharing

We only share data when necessary and lawful, including with:

- Ofsted
- Local Authorities
- Schools and childcare providers
- Health professionals
- Social care and law enforcement

All sharing complies with safeguarding and GDPR requirements.

Data Security

We ensure appropriate security measures:

- Locked filing cabinets
- Password-protected systems
- Restricted access (need-to-know basis)
- Staff training on confidentiality
- Secure digital platforms

Data Retention

We follow recommended retention periods:

- Child records: until age **21 years and 3 months**
- Safeguarding records: until age **25**
- Financial records: **6–7 years**

Records are regularly reviewed and securely destroyed when no longer required.

Data Subject Rights

Individuals have the right to:

- Access their data (Subject Access Request)
- Rectification of inaccurate data
- Erasure (where applicable)

- Restriction of processing
- Object to processing
- Data portability

Requests will be responded to within **one month**.

Complaints can be made to the ICO.

Consent

Where consent is required:

- It will be freely given, specific, informed, and unambiguous
- Recorded and stored
- Withdrawable at any time

Images and Media

Photographs/videos are used only with parental consent for:

- Learning journeys
- Internal displays

Separate consent is required for marketing use.

Data Breaches

In the event of a data breach:

- We will assess the risk immediately
- Report to the ICO within **72 hours** if required
- Inform affected individuals where risk is high
- Record and review all breaches

Safeguarding Override

Where safeguarding concerns arise:

- Confidentiality may be overridden
- Data may be shared without consent
- Always in the child's best interests

Third-Party Processors

We use trusted providers (e.g. childcare apps) and ensure:

- Data Processing Agreements are in place
- Providers comply with UK GDPR
- Data is stored securely in approved location

Staff Responsibilities

All staff must:

- Follow data protection procedures
- Maintain confidentiality
- Report concerns or breaches immediately
- Complete regular training

Failure to comply may result in disciplinary action.

Training and Accountability

We ensure:

- Regular GDPR and safeguarding training
- Confidentiality agreements
- Ongoing audits and monitoring

Automated Decision-Making

Where automated systems are used (e.g. funding checks):

- Decisions are reviewed by staff
- Accuracy and fairness are ensured

Policy Review

This policy is reviewed:

- Annually
- Or sooner if legislation changes

This policy was adopted by

The Butterfly Rooms Ltd

On

01st July 2026

Date to be reviewed

01st July 2027

Signed on behalf of the Management
committee

A.Thompson

Name of signatory

Miss Aimee Thompson