

Privacy Notices

For the Pen Green and Kingswood Integrated Centre
(comprising Pen Green Nursery School, Early Years Setting, Research & Training Base and Integrated Services)

Updated October 2026

1. Pen Green Centre for Children and their Families Privacy Notice

1.1 Who we are

Pen Green Centre for Children and their Families is a maintained nursery school and integrated early years organisation providing nursery education, education and care for children aged 0–3, Children's Centre services, family support, and associated community services.

Pen Green Centre for children and families is the **Data Controller** for personal data processed across the Centre.

ICO Registration Number: ZA130051

Data Protection Officer (DPO): Angela Prodger

Email: dpo@pengreen.org

This privacy notice applies to personal data relating to:

- children and families using our services
- staff and job applicants
- volunteers, trustees and governors
- visitors to our sites
- suppliers, contractors and external consultants

This notice should be read alongside:

- the **Pen Green Research, Development & Training Base Privacy Notice** (where research and training activities apply)
- the **Pen Green Website Privacy Notice** (for online interactions)

1.2 What personal data we process

Privacy Notices for the Pen Green and Kingswood Integrated Centre

Depending on your relationship with the Centre, we may process:

- Personal details (names, addresses, contact details, dates of birth)
- Family and household information
- Attendance and service engagement records
- Educational assessments and progress information
- Special educational needs and disability information
- Health and medical information relevant to care or safeguarding
- Safeguarding and child protection records
- Images and recordings (where appropriate and lawful)
- Staff, student and volunteer records (including recruitment, training and safeguarding checks)

Special category personal data

Some of the information we need to process is classified as special category personal data under UK GDPR because of its particularly sensitive nature.

Depending upon the circumstances, this may include information relating to:

- physical or mental health
- disability and health-related SEND information
- racial or ethnic origin
- religious or philosophical beliefs
- biometric data used to uniquely identify an individual, where facial recognition is used for authorised access to Pen Green premises
- information concerning an individual's sex life or sexual orientation where this is relevant and necessary, for example within a safeguarding record

We only process special category information where it is necessary for a specific and lawful purpose and where an appropriate condition under UK GDPR and the Data Protection Act 2018 applies.

Children's personal information is handled with particular care. Information relating to a child is not automatically special category data, but some of the health, SEND and safeguarding information we hold may fall within the special categories described above.

Criminal offence information

In limited circumstances we may also process information relating to criminal offences, allegations, police involvement or criminal proceedings.

This is most likely to arise through safeguarding and child protection, safer recruitment, Disclosure and Barring Service checks, or allegations involving adults working with children.

We only process this information where we have a lawful basis and are authorised to do so under data protection legislation.

1.3 Why we process personal data (lawful bases)

We process personal data under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other legislation relevant to our functions.

Depending upon the activity, our lawful bases under Article 6 UK GDPR may include:

- **Legal obligation** – where processing is necessary to meet our legal responsibilities, including safeguarding, education, early years, employment and health and safety requirements
- **Public task** – where processing is necessary for us to carry out our official functions or tasks in the public interest, including maintained early education and associated services
- **Contract** – where processing is necessary to enter into or fulfil a contract, including employment and some service arrangements
- **Consent** – where individuals have a genuine choice, for example for some uses of photographs, communications or optional activities
- **Vital interests** – in exceptional circumstances where processing is necessary to protect someone's life

Where we process special category personal data, an additional condition under Article 9 UK GDPR applies. Depending upon the purpose, this may include processing necessary:

- for employment, social security and social protection obligations
- for reasons of substantial public interest, including safeguarding children and individuals at risk
- for health or social care purposes where the statutory requirements are met
- for scientific or historical research or statistical purposes with appropriate safeguards
- with the individual's explicit consent where this is the appropriate basis

For safeguarding purposes, we may rely on the substantial public interest provisions of the Data Protection Act 2018, including Schedule 1, Part 2, paragraph 18 – safeguarding of children and individuals at risk – where its requirements are met.

We do not normally rely on consent to process information where we have a statutory safeguarding responsibility.

1.4 Safeguarding and information sharing

Safeguarding children and families is a statutory responsibility.

Where there are concerns about a child's safety or welfare, personal data may be shared with relevant statutory agencies (such as local authority children's services, health services or the police) without consent, where lawful and necessary.

Safeguarding information may be recorded and managed using secure electronic safeguarding systems, including CPOMS. Access is restricted to authorised staff according to their role and safeguarding responsibilities.

1.5 Staff, volunteers, recruitment and governance

We process personal data relating to staff, volunteers, trustees, governors and job applicants for the purposes of recruitment, employment, safeguarding, supervision, training, payment, governance, and compliance with employment, education and charity law.

This may include information relating to identity, contact details, qualifications, employment history, references, right to work checks, DBS checks, health information where necessary, and records of conduct or performance.

1.6 Access control and site security

We process limited personal data for safeguarding, health and safety, security and access-control purposes.

Pen Green uses a facial recognition access-control system for authorised individuals, including staff, parents and carers, authorised family members and, where appropriate, students or placement students. The system processes biometric data for the purpose of uniquely identifying an individual and controlling access to designated areas of the Centre.

Biometric access is not used for children.

Access is restricted to authorised individuals and biometric access is removed when it is no longer required. Pen Green maintains a Data Protection Impact Assessment (DPIA) covering its use of biometric access control.

Further information about the use of biometric access control and individuals' data protection rights is available from the Data Protection Officer.

1.7 Who we share information with

We may share personal data with:

- Local authorities and government departments (including the Department for Education)
- Health services and specialist professionals
- Schools and early years providers (for transition purposes)
- Partner organisations delivering commissioned services
- Regulatory or inspection bodies

Information is shared only where lawful, necessary and proportionate.

1.8 How we keep data secure

Personal data is stored securely in electronic systems and paper records. Access is restricted to authorised staff who need the information to carry out their role.

We use appropriate technical and organisational measures to protect personal data against loss, misuse or unauthorised access.

1.9 How long we keep personal data

Personal data is retained in line with the **Pen Green Centre for Children and their Families Records Retention Schedule**, which reflects statutory requirements and sector guidance.

Some records (such as safeguarding records) must be retained for extended periods in accordance with the law. When data is no longer required, it is securely disposed of or anonymised.

1.10 Your rights

Under UK GDPR, individuals have rights including:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure (where applicable)
- the right to restrict processing
- the right to object to certain processing
- the right not to be subject to solely automated decision-making

Some rights may be limited where data is processed for safeguarding or other statutory purposes.

1.11 How to raise a concern or complaint

If you have concerns about how your personal data is handled, please contact the Data Protection Officer:

Email: dpo@pengreen.org

You also have the right to complain to the Information Commissioner's Office (ICO).

2. Pen Green Research, Development & Training Base Privacy Notice

2.1 Who we are

The Pen Green Research, Development & Training Base undertakes research, professional development, and workforce training in early childhood education and family services.

For research and training activities, the Research Base operates under the governance of Pen Green Centre for Children and their Families, which is the **Data Controller**.

This notice applies to research participants, students, practitioners, and professionals engaging with Research Base activities.

2.2 Types of data we process

Research and training activities may involve processing:

- Personal details and contact information

- Professional and educational background
- Special category data (including health, development, and family context)
- Video, audio and observational data
- Reflective materials, transcripts and research records

2.3 Lawful bases for research processing

We process research data under the following lawful bases:

- **Public task** – research and workforce development in early childhood education
- **Legitimate interests** – where research contributes to improvement of practice and services
- **Explicit consent** – particularly for participation, recording, and use of identifiable research data

For special category data, we rely on UK GDPR conditions including research in the public interest, safeguarding, and explicit consent where required.

2.4 Ethics, consent and participation

Research is conducted in line with ethical principles and may be approved through Pen Green and/or university ethics processes.

Participants are provided with clear information about:

- the purpose of the research
- what participation involves
- how their data will be used and stored
- their right to withdraw

Where consent is withdrawn, no new data will be collected. Data already collected may be retained where lawful, particularly where it has been anonymised or forms part of the research record.

2.5 Data sharing and publication

Research data may be shared with:

- academic partners

- funders and commissioners
- research collaborators

Published outputs will not identify individuals unless explicit consent has been given.

2.6 Retention and archiving

Research data may be retained for extended periods where necessary for:

- academic integrity
- longitudinal analysis
- archiving in the public interest

Retention follows the Pen Green Records Retention Schedule and ethical guidance.

2.7 Your rights

Research participants have the same rights under UK GDPR as outlined in the Pen Green Centre for children and families Privacy Notice, subject to lawful research exemptions.

2.8 Contact and complaints

For research-related data queries, contact:

Data Protection Officer: Angela Prodger

Email: dpo@pengreen.org

3. Pen Green Website Privacy Notice

3.1 About this notice

This notice explains how personal data is processed when you use the Pen Green website.

It applies only to website visitors and online interactions.

3.2 Data we collect

We may collect:

- information you provide via contact forms
- email addresses where you sign up for updates
- technical information such as IP address, browser type and usage data
- cookie and analytics information

3.3 Why we collect this data

Website data is processed to:

- respond to enquiries
- provide requested information
- improve website performance and content
- manage communications

Lawful bases include **legitimate interests** and **consent**, depending on the activity.

3.4 Cookies and analytics

The website uses cookies and similar technologies to improve user experience. You can manage cookie preferences through your browser settings.

3.5 Data sharing and storage

Website data may be processed by trusted service providers acting on our behalf. Data is stored securely and not retained longer than necessary.

3.6 Links to other privacy notices

If you engage with Pen Green services or research, your personal data will be processed in line with:

- the **Pen Green Centre for Children and their Families Privacy Notice**
- the **Pen Green Research, Development & Training Base Privacy Notice**

Privacy Notices for the Pen Green and Kingswood Integrated Centre

3.7 Your rights and contact details

For questions about website data, contact:

Data Protection Officer: Angela Prodger

Email: dpo@pengreen.org

You also have the right to complain to the Information Commissioner's Office.