## MILLS & REEVE

## Oxford Colleges GDPR Project - Creck

ID.	Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
1	Information about attendees' health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.	We obtain this data from you We generate this data about you Third party	When we consider what reasonable adjustments to make or we need to take account of any dietary requirements attendees have (whether for medical or belief reasons), or where there is a medical emergency, and any decisions that we take as a result.	We retain this information for the duration of our agreement with you. The information is held in order to ensure you are provided with foods meeting your personal requirements, and in order that we can make appropriate and reasonable adjustments to the service and facilities we offer. The information will be deleted within 3 months of the end of that agreement	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law, and/or food safety law.	Substantial public interest under the UK Data Protection Act 2018		N/A	
2	Information about service users' ethnicity, health, religion or belief and/or sexuality.	We obtain this data from you Third party	For equality monitoring purposes and in relation to attendees personal development.	Equality monitoring information will only be held and processed in anonymised form. This anonymised information will be kept in perpetuity in an anonymised form for College records and monitoring purposes.  To the extent that such information is held in relation to attendee development records, complaints handling, correspondence with service users, and accident and similar records, please review the entries specific to such categories of records to identify the expected retention period.		The College and its service users have a legitimate interest in monitoring and promoting equality of opportunity.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for equality of opportunity or treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	
3	Service user's contact details (name, current and historic addresses, telephone numbers)	We obtain this data from you Third party	In order to be able to contact service users and create appropriate records in relation to the service provided to each. This information is also used following the end of an agreement for creche provision, in order to provide notification of creche celebrations and/or for fundraising purposes.	held for 7 years following the end of thprovision of creche services.  Where this information is held in registers, medication records, accident books pertaining to children, and similar materials, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records, in accordance with the Limitation Act	for performance of our contract with you Processing is necessary	properly respond to and engage with audits of	N/A		N/A	
4	Security records, including CCTV records and access records. Records of security incidents, accident reports and health and safety record:	about you	To monitor the attendance of people on Wycliffe Hall's premises, as part of the College's safety and security arrangements.	one year. Security incident logs, accident reports, and	for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We are required by child protection and safeguarding legislation to control and monitor access to premises. In addition, the College has a legitimate interest in monitoring the attendance of individuals on College premises as part of safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	that it is necessary for reasons of substantial public interest in the exercise of a function conferred by enactment or a rule of law, or to protect the public.	necessary in connection with legal	To the extent that the data held concerns criminal offence/allegation information. The basis for such processing will typically be the prevention or detection of an unlawful act.

5	Records of creche life: photographs and written records of events, activities, performances and similar.	We generate this data about you	To maintain a record of creche events and activities.	Records may be retained in perpetuity in the college archive.	Processing is necessary for performance of our contract with you  The College has a legitimate interest in maintaining a record of creche activities and in marketing creche services.	N/A		N/A	
					Processing is necessary for compliance with a legal obligation				
					Processing is necessary for the purposes of our or someone else's leating the state of the state				
					legitimate interests, except where overridden by your data protection rights				
					and freedoms				
6	Correspondence with service users	We obtain this data from you We generate this data about you	To hold an accurate record of our communications with you.	Correspondence will be held for up to 7 years following the end of provision of creche services.	Processing is necessary for performance of our contract with you.  Service users and those parts of the College for performance of our engaged in creche provision have a legitimate interest in the availability of an accurate record of communications between the various	N/A		N/A	
		about you		Where this information relates to registers, medication records, accident books pertaining to children, and similar materials, the information is held until the child reaches the	Processing is necessary parties over time.				
				age of 21 - or until the child reaches the age of 24 where this data is held in child protection records, in accordance with the Limitation Act	except where overridden by your data protection rights				
7	Biographical information of attendees,		As part of each creche attendee's profile to	1980/The Statute of Limitations (Amendment) Act 1991. The majority of data held by the creche will be		Substantial public	To the extent that special category data is	N/A	
	including their interests, habits, family details, nationality, culture and achievements.		enable appropriate care, in line with legal obligations, to be provided.	held for 3 years following the end of provision of creche services.  Where this information is included in records	for performance of our contract with you.  Processing is necessary	interest under the UK Data Protection Act 2018	processed, the processing is necessary for the provision of early years education, and provision of equality of opportunity and/or treatment. Such processing is necessary to		
				of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.	for compliance with a legal obligation		avoid the commission of unlawful acts under the Equality Act 2010, and /or under health and safety law.		
8	Financial information including bank/building society account numbers, sort codes, credit/debit card numbers, invoices and outstanding payment information.	We obtain this data from you We generate this data about you Third party	As part of taking payments (including deposits and balances) for childcare provided, calculating fees and entitlements, issuing invoices and pursuing outstanding amounts.		Processing is necessary for performance of our contract with you  Processing is necessary	N/A		N/A	
		Tilliu party		proceedings.	in order to take steps at your request prior to entering a contract				
9	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom or	about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	This data will be retained for up to 7 years from the end of provision of creche services, unless there is a compelling justification for the data to be retained for a longer period, e.g. in connection with legal advice, or in relation to	for compliance with a legal obligation		functions conferred under law. Such processing	a condition in Part 2 of Schedule 1 to the Data	processing is also necessary to avoid the commission of unlawful acts under the
	information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.			auditing obligations.					relevant legislation.
10	Opinions and comments made by service users regarding creche provision, as expressed in communications with the College (to the extent recorded)	We obtain this data from you	The views and concerns of service users help to guide the management of the creche provision.	To the extent that this data is considered in management discussions and papers, copies will be retained in the College archives permanently. Other instances of this data will be retained for up to 6 years following the date of record.	for the purposes of our managing our creche provision. or someone else's legitimate interests,	N/A		N/A	
				Where this information is included in records of accidents and/or incidents pertaining to children, the information is held until the child reaches the age of 21 - or until the child reaches the age of 24 where this data is held in child protection records - in accordance with	data protection rights and freedoms				
11	Application paperwork, including details of	We obtain this data	As part of enrolling attendees.	the Limitation Act 1980/The Statute of Limitations (Amendment) Act 1991.  Data for unsuccessful applicants will be	Processing is necessary	Substantial public	To the extent that the data is special	N/A	
	requested hours.	from you		retained for a maximum of 1 year. Data for attendees will be retained for up to 6 years following the end of provision of creche services.	for performance of our contract with you  Processing is necessary in order to take steps	Data Protection Act 2018	category data, we process it in accordance with obligations imposed by law.		
					at your request prior to entering a contract				

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12	Next of kin/emergency contact data	We obtain this data	To enable us to contact appropriate individuals	Until the end of provision of creche services.	Processing is necessary	It is in the interests of service users' legitimate	N/A		N/A
		from you	in the event that attendees are injured,		for the purposes of our				
		Third party	become unwell, or there other relevant cause		or someone else's	family member or other designated			
			for concern regarding their well-being.		legitimate interests,	representative in a situation where there is			
					except where	significant concern for an attendee's welfare.			
					overridden by your				
					data protection rights				
					and freedoms				
					and needons				
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13	Complaints and related investigations raised	We obtain this data	To ensure that complaints are dealt with in an			All parties have a legitimate interest in the	Substantial public		N/A
	with the creche and relating to creche	from you	appropriate and timely manner, resolved, and	following the end of the provision of creche	•			these purposes, the College is exercising	
	provision, including records of any		that lessons learned and suggested	services.	contract with you.		Data Protection Act	functions conferred under law, and/or such	
	investigation and/or decision that we take, and		improvements are acted upon.			pertaining to childcare to keep appropriate	2018	processing may also necessary to avoid the	
	of any subsequent appeal of resolution.	Third party		Where this data is included in records of	Processing is necessary	records and provide materials to inspectors.		commission of unlawful acts under the Equality	
				accidents and/or incidents pertaining to	for compliance with a			Act 2010.	
				children, the information is held until the child	legal obligation.				
				reaches the age of 21 - or until the child	0			Processing may also be necessary for the	
				reaches the age of 24 where this data is held in	Processing is necessary			exercise, establishment or defence of legal	
				child protection records - in accordance with	for the purposes of our			claims.	
								ciums.	
				the Limitation Act 1980/The Statute of	or someone else's				
				Limitations (Amendment) Act 1991.	legitimate interests,				
					except where				
					overridden by your				
					data protection rights				
					and freedoms				
14	Intervention and behavioural management	We generate this data	As part of the provision of appropriate, child-	The data is held by the creche for 3 years	Processing is necessary	We are required by law to keep appropriate	N/A		N/A
17	records.	about you	focused care.	following the end of provision of creche		records and make those available to inspectors	1975		19/15
	records.	about you	locused care.	· · ·					
				services.	contract with you	where required to do so.			
					Processing is necessary				
				Where this information is included in records	for compliance with a				
				of accidents and/or incidents pertaining to	legal obligation				
				children, the information is held until the child					
				reaches the age of 21 - or until the child					
				reaches the age of 24 where this data is held in					
				child protection records - in accordance with					
				the Limitation Act 1980/The Statute of					
				Limitations (Amendment) Act 1991.					
				Limitations (Amenament) Act 1991.					
15	Attendance records	We generate this data	We monitor attendance at the setting as part	We hold this data for 6 years following the and	Processing is nocosses	We have a legitimate interest in monitoring	N/A		N/A
13	Attenuance records						IN/M		IV/M
		about you	of financial management, staffing planning and	or provision of crecne services.		usage of the nursery service. We also have a			
			also in accordance with our child protection		contract with you.	legal obligation to track the attendance of			
			and welfare obligations.			service users, where they use state-funded			
					Processing is necessary	childcare schemes.			
					for compliance with a				
					legal obligation.				
					Processing is necessary				
					for the purposes of our				
		1			or someone else's				
					legitimate interests,				l l
						l l			
					except where				
					except where overridden by your				
					except where				
					except where overridden by your				
					except where overridden by your data protection rights				
					except where overridden by your data protection rights				