

Record of Processing Activities

[**NOTE:** This record of processing activities is made available by tiney as an example only. It is your responsibility to make sure that any records you keep comply with applicable law, and to take legal advice if necessary. You can read detailed guidance on how to complete and maintain Article 30 records [on the ICO's website](#).]

This Record of Processing Activities describes how [CHILDMINDER] of [ADDRESS] [trading as [TRADING NAME] – delete if not relevant] processes personal data, meeting the requirements of Article 30 of the EU General Data Protection Regulation as transposed into UK law (**GDPR**).

Data Controller Details:

Name: [CHILDMINDER NAME]

Address: [ADDRESS]

Telephone Number: [TELEPHONE NUMBER]

Website: [WEBSITE OR LINK TO TINEY PROFILE]

Joint Controller: Tiney Limited t/a tiney – International House, 12 Constance Street, London, E16 2DQ in relation to certain personal data stored in tiney's platform.

Categories of Data Subjects [DELETE AS APPROPRIATE]

I collect personal data from the following categories of data subjects:

- my customers (parents/guardians and children);
- business contacts, like suppliers and partners;
- employees and job applicants. [DELETE if not applicable – if you don't have employees]

Categories of Personal Data

I collect these kinds of personal data about parents/guardians and children:

- **Contact Data** - Contact details for parents/guardians, emergency contacts, doctors, individuals authorised to collect children from their care and any other individual whose details are provided to them by parents. This might include names, job titles, postal addresses, email addresses and phone numbers.
- **Correspondence Data** – Correspondence with parents and others in relation to my childcare services.
- **Childcare Data** - Information that I am are required to collect by law in relation to children in my care. This includes the child's name, DOB, address and contact details, allergies and dietary requirements, attendance information, emergency and parental contact details, information related to special needs, medical history and/or accident reports.
- **Development Data** - Developmental records relating to children in my care. This may include records of the child's learning and development at home, information about their parents, observations of the child's learning, assessments, individual planning and regular progress summaries.
- **Photo Data** - Photos of the children in my care.

- **Special Category Data** - Any other special categories of data relating to parents'/guardians' or childrens' health, genetic or biometric data, racial or ethnic origin or religious or philosophical beliefs.

I collect these kinds of personal data about other business contacts, like suppliers and partners:

- Name and contact information, correspondence.
- Relevant contractual information (like payment details, copies of contractual documents).

[DELETE IF NOT RELEVANT] [I collect these kinds of personal data about employees and job applicants
[DELETE AS APPROPRIATE]:

- Personal details including name and contact information, and CV.
- Date of birth.
- Gender.
- Marital status.
- Beneficiary and emergency contact information.
- National insurance number.
- Education and training details.
- Bank account details and payroll information.
- Salary and benefit information.
- Performance information.
- Employment records.

Purposes of Data Processing

I collect and process personal data about parents/guardians and children:

- to communicate with parents/guardians and others, in connection with the provision of childcare.
- to provide and improve my childcare services.
- to meet regulatory record-keeping obligations (in particular the requirements of the EYFS).
- to market their services.
- legal compliance (e.g. maintaining tax records, keeping a record of consent).
- to assist with bringing and defending legal claims.
- record-keeping, storage and hosting, back-up and restoration of their systems and data.

I collect and process personal data about other business contacts to obtain products and services, keep records, and administer my business relationships.

[DELETE IF NOT RELEVANT] I collect and processes personal data about employees and job applicants:

- to recruit and select employees.
- to manage employees.
- to provide payroll and benefits.
- to complying with legal obligations as an employer (including in relation to record-keeping).
- to provide education, training, and development activities.]

Categories of Personal Data Recipients

I may disclose personal data to:

- third parties or agencies involved in a child's care, as required by the EYFS.
- a child's health visitor (in particular, in relation to a child's 2 year progress check).
- the Local Authority (in relation to funding and to report on attendance).
- OFSTED (for child protection purposes).
- HMRC/Tax credits (to provide copies of invoices and expenses).
- my advisors, such as insurers and/or professional advisors (to take professional advice and manage legal disputes).
- service providers (e.g. hosting service providers such as Microsoft, or email service providers such as Microsoft or Google).
- Tiney limited t/a tiney in connection with my use of tiney's platform. The tiney platform allows me, and parents/guardians, to share information, communication and manage my services in various ways, so any of the data above relating to parents/guardians or children might be stored in the tiney platform (in particular in connection with contractual arrangements, payment of invoices and messages and shared records between parents/guardians and me on tiney's platform).
- any other recipient if I am legally required to share that data with that recipient.

Some of the personal data above might be transferred outside the UK and EEA (for instance, online service providers might have servers overseas). If so, it will be transferred to [TERRITORY]. [That territory is one in relation to which the European Commission has made a finding of adequacy.*] [The transfer will be made under contractual terms providing appropriate safeguards (meaning that my contract with the relevant service provider will include the Standard Contractual Clauses approved by the European Commission).**]

[*Note – “findings of adequacy” apply to Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland, Uruguay. That means data can be transferred to those territories without the need for further safeguards. Transfers from the UK to the EEA are fine, too (as the UK has made its own “finding of adequacy” approving the EEA).]

[**Note – If you send data overseas to a territory which is not the subject of a “finding of adequacy”, then GDPR requires that the contract you have with your service provider should contain certain contract terms which have been approved by the European Commission as providing suitable protection – these are called the Standard Contractual Clauses or SCCs. Most major service providers like Microsoft, Google, etc., will include the Standard Contractual Clauses in their standard terms either automatically or by a simple request process. You may wish to double-check whether these are included, and also whether your data is even leaving the UK or EEA.]

Personal Data Retention

I only keep personal data for as long as necessary for the purposes set out above. As exceptions, I may keep it longer to satisfy any legal, accounting, or reporting obligations, or in connection with legal claims. To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of personal data, the potential risk of harm if it is lost, and applicable legal requirements (like the requirement for me to keep tax records).

I typically keep personal data for the periods set out below.

Information about parents/guardians and children under my care:

- I keep certain safeguarding and welfare data until the child reaches 25 years of age (in line with applicable law and with PACEY recommendations). In particular, I will keep the following for 25 years: details of child and parent, emergency contacts and summary of service, attendance registers, accident/incident reports, medication forms and records of medication given, and risk assessments.
- Other contractual information and correspondence relating to my contract with parents will be kept for seven years from the end of the contract (the limitation period for contract claims plus a modest period of contingency).

Information about business contacts is kept for seven years from the end of any contract with them (the limitation period for contract claims plus a modest period of contingency). If I don't have a contract concerning the relevant contact, I delete their data when it is no longer reasonably needed, which might vary depending on the nature of our business relationship or prospective business relationship.

[DELETE/AMEND AS APPROPRIATE]:

Information about job applicants is kept for 6 months from end of correspondence.

Information about employees is kept for the following periods:

- Immigration / RTW checks are kept for three years after the end of employment.
- Employee records (e.g. terms of employment, training records, grievance/disciplinary, qualifications, job history, annual leave, assessments, termination correspondence) are kept for seven years after employment ceases.
- Annual leave records are kept for seven years.
- Payroll records (including PAYE records), expenses records, advances for travel / loan are kept for seven years from the financial year end in which payments were made.
- Bank account details are deleted shortly after the last payment is made following end of employment.
- Working time records (opt-out forms, time sheets, health assessment records) are kept for three years from date of records.
- Maternity records (maternity payments, dates of leave, period without payment, maternity certificates) are kept for four years from end of tax year in which payments are made.
- Accident records are kept for at least four years from date of accident.
- Vetting (criminal records) will be deleted after recruitment.
- Personal details including name, contact information, date of birth, gender, marital status, beneficiary and emergency contact information, will be kept for seven years from end of employment.

Technical and Organisational Security Measures

I have implemented appropriate technical and organisational security measures to protect personal data, and in particular:

- I keep hard copies of relevant documents in secure, locked storage.
- Electronic records are kept in devices where are secure, password-locked, encrypted and wherever possible capable of tracking and remote de-activation or deletion.
- Where I use third party services (like tiney) I check their security practices and credentials to make sure I am happy that data I entrust is secure. When a service offers enhanced security features like two-factor authentication I take advantage of them.
- Electronic records are access-controlled.

Changes to this Record of Processing Activities

I may amend this document from time to time.

Last modified: [DATE]