

Merthyr Tydfil County Borough Council  
**PRIVACY NOTICE**

**EARLY YEARS & FLYING START**

This notice has been written in accordance with the General Data Protection Regulation and relevant legislation

**Information Governance Team**

**Lisa Richards**  
Data Protection Officer

Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN  
[data.protection@merthyr.gov.uk](mailto:data.protection@merthyr.gov.uk), 01685 725000

## 1. IMPORTANT INFORMATION

Merthyr Tydfil County Borough Council is responsible for deciding how we hold and use personal data we collect. We are required under the data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services. We may update this notice at any time if we do, we will ensure that an updated copy of this notice is made available to you as soon as reasonably practical.

It is important that you read this privacy notice together with our [Privacy Standards Policy and full privacy notice](#) which contains more detailed information about our data processing and can be accessed on our website.

This privacy notice provides information on how Merthyr Tydfil County Borough Council collects and processes your personal data when we are delivering the Flying Start Programme to families living within the Flying Start catchment area of Merthyr Tydfil.

This notice relates specifically to our Flying Start and Early Years Provision. Flying Start is a Welsh Government funded project targeted at the areas of highest need throughout Wales, its aim is to provide children aged 0-4 years with the best possible 'Flying Start' in life.

The Flying Start Programme provides free quality, part-time childcare for 2-3 year olds, an enhanced health visiting & midwifery service, access to parenting programmes, support for early language development and family support services. The programme is currently delivered in various communities across Merthyr Tydfil.

## 2. WHO WE ARE

Merthyr Tydfil County Borough Council is the data controller therefore we are responsible for the personal data we hold. The Council is made up of different departments, details of which can be found on our [website](#). When we mention the Department, we are referring to the Early Years and Flying Start Team who is responsible for processing your data for the services detailed in this privacy notice.

This notice applies to parents and their children of the Early Years and Flying Start Programme, which includes young children aged 0-4 years and their parents/guardians/carers.

Merthyr Tydfil County Borough Council has appointed a Data Protection Officer who can be contacted using the details at the top of this notice.

## 3. WHAT PERSONAL DATA IS USED

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Personal descriptors which include your name, address, email address, telephone number, date of birth
- Identification numbers, including your national insurance number, WCCIS number
- Credit information such as your credit history, loan information or debts
- Education data such as your qualifications, exam results, education history, training course attendance
- Employment data, such as your job title, employment history, this may also include whether you serve in the armed forces
- Geospatial Data, In order to access the Flying Start Provision you have to reside within a Flying Start area. As such we will record details of your location and we are required to monitor where you reside to ensure you are still entitled to receive support

We may also use and store demographic data which provides context to your personal data, such as:

- Lifestyle data, this data will include your marital status, your characteristics, general reputation, general appearance, your financial and social status, personal opinions, special dietary requirements.
- Data that relates to your family life such as the number of people living in your household, your relationships, where your children attend school, whether your children are older and are in university or are no longer living at home, your children's dates of birth, gender, height, weight, next of kin and emergency contact information.

We may also process more sensitive data such as:

- Criminal data which will include details of arrests, convictions, charges or pardons, prison data, probation data, we may also obtain information from the disclosure and barring service.
- Cultural information
- Social services data which may include whether you have a looked after child, a vulnerable adult, whether you are a foster carer or care for a member of your family, care plan data and special educational needs data etc.
- We may also capture photographs or video footage of you if you are attending one of our community groups.

There are special categories of more sensitive personal data which require a higher level of protection. We collect, store and use the following special categories of personal data about you:

- Racial or ethnic origin

- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Biometric data
- Health including physical and mental health
- Sex life or sexual orientation

We explain the different methods used to collect this data about you in section 4 of this privacy notice.

## 4. HOW YOUR PERSONAL DATA IS COLLECTED

The Department delivers a number of projects under the Flying Start provision; these include childcare provisions, enhanced health visiting and midwifery service, parenting skills and early language development. The Department also has transition workers that will listen and provide support to families with day to day life, at a time when they need it most. Details of these projects can be found on the Family Information Services website.

In order to access these services you are required to complete our registration forms for each service. These include the registration forms for:

Flying Start Programme  
 Flying Start Outreach Application Form  
 Flying Start Enhanced Support Referral Form  
 Flying Start ELD Group Registration Form  
 Families First ELD Registration Form  
 Flying Start Childcare Registration Form  
 Flying Start Record of Existing Injury Form  
 Flying Start Attendance Form

We will input your personal data into our Council computer systems, namely the Flying Start Database. Your personal data is stored on the Council's secure computer servers and only authorised personnel can access it. All personnel that have access to your personal data are provided with annual data protection and information security training.

We may sometimes collect additional personal data from third parties including other public bodies such as Cwm Taf Morgannwg University Health Board, various Schools within the Borough and other statutory bodies.

We will collect additional personal data during our Council business functions and the services we provide to you throughout your contact with us. For more information about how your personal data is used in other service areas please visit our privacy notice [webpage](#).

## 5. LEGAL BASIS FOR PROCESSING

We will only use your personal data where the data protection legislation allows us too. These will include the provisions set out under the [General Data Protection Regulations](#) and where relevant the [Data Protection Act 2018](#). We will use your personal data in the following circumstances:

Article 6(1)(a) which relates to consent for the following services:

Flying Start Outreach Provision  
 Flying Start Enhanced Support Referral Form  
 Request for Education Psychologist Involvement  
 One Page Profile Transition  
 Wellcomm - Speech & Language Screening  
 Flying Start ELD Group  
 Individual Communication Plan  
 Curriculum Assessment Request for pre-school staff to administer medication  
 Flying Start Childcare Provision  
 You will be asked to complete an application form to access the above services.

Article 6(1)(c) which related to a legal obligation under the following laws:

Social Services and Well-being (Wales) Act 2014  
 Equalities Act 2010  
 Child and Families (Wales) Measure 2010  
 Children Act 2004  
 Children Act 1989  
 Well-being of Future Generations (Wales) Act 2015

Article 6(1)(e) which related to a public task as per the Welsh Governments Guidance relating to the All Wales Safeguarding Procedures, Children and Young People: Rights to Action, Safeguarding Children: Working together under the Children Act 2004.

We collect and use your personal information to carry out tasks in the public interest which will include providing you with free quality, part-time childcare which is available for 2-3 year olds; an enhanced Health Visiting and Midwifery service; access to parenting programmes; support for early language development and family support services.

We will also process your personal data for official purposes which enable us to comply with the following Welsh Governments Guidance:

Flying Start – Financial Management Guidance  
 Flying Start – Outreach Guidance  
 Flying Start – Performance Data Guidance  
 Flying Start – Strategic Guidance  
 Flying Start – Transition Guidance

Flying Start Childcare - Quality Childcare Guidance  
Flying Start Health Programme Guidance  
Flying Start Health - Health Support Services Guidance  
Flying Start: Annex - Parenting Support Guidance  
Flying Start SLC - Guidance on Speech  
Language and Communication (SLC)  
Flying Start – Cross Border Guidance

Copies of the above guidance can be found on the Welsh Governments website, [www.wales.gov.uk](http://www.wales.gov.uk).

## 6. SHARING YOUR PERSONAL DATA

We may share your personal data across the Department to provide you with the support you require, we will also share your data internally with other Departments which includes:

Local Authority Statutory Nursery Provision	-	To facilitate your child’s placement within the nursery provision
Local Authority Nursery Organisations	-	To facilitate your child’s placement within the nursery provision
Children’s Social Services	-	If your child is subject to any child protection proceedings
Preventative Services Department	-	To ensure that you are receiving all support available from the Council
Families First Department	-	To provide you with further information relating to support services
Education Services Department	-	To facilitate your child’s transition from nursery into statutory education
Legal Services	-	To defend any legal claims or allegations
Information Governance Team	-	In the event that you submit an individual rights request

We will also share your personal data with the Flying Start Enhanced Support Panel which includes representatives from Cwm Taf Morgannwg University Health Board, Flying Start Early Years Team (inc Educational Psychologist, Advisory Teacher, Development Officers and Project Support Officer) Flying Start Speech & Language, Principal Paediatric Physiotherapist, and a Specialist Nurse for Children with Additional Needs.

To ensure we can carry out these services we will also be required to share your personal data with external organisations which will include:

Abercanaid Community School  
Bedlinog Community Primary School  
Caedraw Primary School  
Cyfarthfa Park Primary School  
Dowlais Primary School  
Edwardsville Primary School  
Gellifaelog Primary School  
Goetre Primary School  
Gwaunfarren Primary School  
Heolgerrig Community School  
Pantysgallog Primary School  
St Aloysius RC Primary  
St Illtyd’s RC Primary  
St Mary’s RC Primary  
Trelewis Primary School  
Troedyrhiw Primary School  
Twynnyrolyn Community School  
Ynysowen Community Primary School  
Ysgol Gynradd Coed y Dderwen  
Ysgol Gynradd Gymraeg Rhyd-y-Grug  
Ysgol Gynradd Gymraeg Santes Tudful  
Ysgol Y Graig Primary  
Childminders  
Private Day Nurseries  
Voluntary Nursery Organisation  
Cwm Taf Morgannwg University Health Board  
Flying Start Central Team (Welsh Government)

The Council has signed a WASPI Data Sharing Agreement with the organisations listed above which can be located [here](#). There are also occasions when the Council is required by law to share this information with the parties listed above, this data sharing is not classed as a routine disclosure or a formal working arrangement, as such we are not required to enter into a formal data sharing agreement.

There may be occasions when we must share your personal data with Welsh Government for statistical and analysis reasons. Welsh Government use personal data held by us to regulate how we discharge our public functions. For more information on how Welsh Government use your personal data within the Flying Start Programme please visit their website, [Flying Start programme | GOV.WALES](#).

We will not transfer your data to any countries outside of the [European Economic Area](#). If we do, we will inform you as soon as possible and you can expect a similar degree of protection in respect of your personal data.

## 7. HOW LONG WE KEEP YOUR PERSONAL DATA

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The personal information collected in accordance with the processing detailed in this notice will be retained for different periods.

We will retain registration with the programme for 25 years. Records relating to our childcare provision, safeguarding concerns and any professional assessments made will be retained for 35 years. Records held relating to community group registrations will be retained for 3 years after the file has closed or the child has left the setting, whichever is longest. After this date, your personal data will be securely destroyed.

Details of retention periods for different aspects of your personal data are available in our Records Management Policy which is available on our website ([www.merthyr.gov.uk](http://www.merthyr.gov.uk)).

## 8. HOW WE KEEP YOUR PERSONAL DATA SECURE

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorised way. We limit access to your personal data to those employees who have a business need to know. Our employees will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. You can find out more about how we keep your personal data secure by contacting our Information Security Officer on [information.security@merthyr.gov.uk](mailto:information.security@merthyr.gov.uk).

## 9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data. These are outlined in the GDPR and include:

- The right to Rectification – you have the right to ask to have your information corrected.
- The right to Restrict processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to Object – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to Erasure - you may request that we erase your personal data however, this may delay or prevent us delivering a service, or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to not be subject to Automated decision making and profiling.
- The right of Access – you have the right to ask us for copies of your personal data. To make a request, please contact the Information Governance Team.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if you make any changes to your personal data so that we can update our records.

If you want to review, verify, correct, request erasure, object, or request that we transfer a copy of your personal data to another party, please contact the Data Protection Officer in writing using the contact details provided at the top of this notice.

## 10. FURTHER DETAILS

You also have the right to make a complaint at any time to our Data Protection Officer, whose contact details are provided above, or the Information Commissioner's Office, the UK supervisory authority for data protection issues:

Address: Information Commissioner's Office (Wales), 2<sup>nd</sup> Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)  
Tel: 0330 414 6421

If you are looking for more information on how we process your personal data including data security, data retention, individual rights please access our [full privacy policy](#). You can also obtain information directly from Information Commissioners Office [website](http://www.ico.org.uk), [www.ico.org.uk](http://www.ico.org.uk).