

Record keeping

5.9 Cloud Storage

Statement of Intent

At St Joseph's Nympsfield Out of School Club we aim to ensure that any use of cloud computing services adhere to any requirements with regards to General Data Protection Regulations (GDPR) 2018 and Data Protection Act (DPA) 2018. We ensure that parents/carers have been given every opportunity to opt out of the setting using the personal information on them and their child for early years requirements. All parents/carers have received a copy of the Out of School Club's (OOSC) Privacy Notice when they have registered on the online booking system. All staff receive a copy of the OOSC's Staff Privacy Notice.

Aim of Policy

This document sets out St Joseph's Nympsfield Out of School Club's policy for the use of cloud computing services, also known as cloud computing, cloud services or cloud. It is meant to ensure that cloud services are not used without the Chair's knowledge. It is imperative that staff and committee members do not open other cloud services accounts or enter into cloud computing services contracts, to use with regards to St Joseph's Nympsfield Out of School Club.

Cloud Computing - defined

Cloud computing is a method of delivering Information and Communication Technology (ICT) services where the customer uses (either free or for a fee), rather than necessarily owns, the resources. These services are typically provided by third parties using Internet technologies.

Cloud computing offers a number of advantages including low costs, high performance and quick delivery of services. However, without adequate controls, it also exposes individuals and organisations to online threats such a data loss or theft etc.

There are many cloud computing services providers available, for example: Amazon Cloud, Google Drive (GDrive), Dropbox.com, Microsoft Cloud, IBM etc (NB: not an exhaustive list). They offer a variety of free or fee paid services. St Joseph's Nympsfield Out of School Club uses the services of GDrive attached to the pre-school email address'. GDrive is a personal cloud storage¹ service built for the users of "G Suite" to enable them to store data in the cloud seamlessly so that users can access their stored data from anywhere and share it with other GDrive users. Access to the cloud service is over the public internet.

Data Protection

The Information Commissioner's Office² defines personal data as "any information relating to an identified or identifiable natural person ('**data** subject'); an identifiable natural person is one who can be identified, directly or indirectly in particular by reference to an identifier such as a name, an identification number, location **data**, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural **person**."

¹ Though is considered as a public cloud service too.

² www.ico.org.uk

When using a GDrive, the organisation (St Joseph's Nympsfield Out of School Club) will determine the purposes for which and the manner in which any personal data are being processed. The Pre-school will continue to be a data controller and will have overall responsibility to ensure it meets its obligations under GDPR 2018 and DPA 2018³. St Joseph's Pre-school's Data Protection Lead is the Management Committee Chair.

To ensure GDPR compliance it has been necessary to check that Google has a storage facility within the European Union (EU) or in a country that has laws compatible with GDPR. The setting notes the information on www.measuredcollective.com/gdpr-google-workspace-how-to-stay-compliant-with-gdpr/.

Data subjects still retain their right of access to their personal data and the right to object to their personal data being processed for certain purposes. For more details see Policy 5.5 Data Subject Access Requests.

The data held on the GDrive attached to the OOSC, Chair, Treasurer, Secretary, Administrator and Play Leader's email address', is reviewed annually to ensure it is kept in line with GDPR/DPA requirements, statutory requirements and our Retention Period for Records⁴ policy.

Reliability and resilience

Using a dedicated computing provider can help safeguard against loss of service (outages) by providing a more reliable and resilient service. However, to mitigate the impact of loss of data, St Joseph's Nympsfield Out of School Club ensures that all data (including business documents and files) are regularly backed up.

Scope

This policy applies to all staff and committee members of St Joseph's Nympsfield Out of School Club, no exceptions. This policy pertains specifically to document storage on an external cloud service (Google). Personal accounts are excluded.

Policy:

- The use of cloud computing services for work purposes, must be formally authorised by the Chair.
- For any cloud computing services that require users to agree to terms of service, such as agreements, must be reviewed and approved by the Chair and the Committee. This is reviewed periodically.
- The use of such services must comply with St Joseph's Nympsfield Out of School Club's existing ICT policy⁵.
- Staff and committee members who are given access to the GDrive by the Chair, must not share log-in credentials with any other person(s) outside the setting or not authorised by the Chair.
- The use of such services must comply with all laws and regulations governing the handling of personal identifiable information, financial data or any other data owned or collected by St Joseph's Pre-school.

³ Policy 5.3 Data Protection

⁴ Policy 5.6

⁵ Policy 1.11.1 Acceptable Use of Technology

- The Chair, as Data Protection Lead, decides what data may or may not be stored in the Cloud.
- Personal cloud service accounts may not be used for the storage, manipulation or exchange of Pre-school related communications or Pre-school owned data.

Access control

Access to the GDrive attached to the OOSC email address', is via username and password system. Access is restricted to those Committee members who are in "Officer" roles and to the Administrator and Play Leader. The Chair/Treasurer/Secretary are responsible for ensuring that the password for their specific OOSC email address, is changed annually, ie. after the Annual General Meeting, and access is reviewed annually too.

In some cases certain files or folders are "shared" and access either limited to "read only" or they recipient is given "edit" permissions too. This can, in some cases ensure that actual access to an email address is not required.

Further Guidance

- [Guidance on the use of cloud computing Version 1.1](#) (ICO)

Legal Requirements

- Childcare Acts 2006 and 2016
- Early Years Foundation Stage (EYFS) Framework (latest version)
- General Data Protection Regulations (2018)
- Data Protection Act 2018

Associated Policies and Procedures

- 5.3 Data Protection
- 5.4 Data Subject Access Requests
- 5.5 Data Breaches
- 5.6 Retention of Records Period
- St Joseph's Nympsfield Out of School Club's Privacy Notice and Staff Privacy Notice

| Version Number | Author | Purpose of change | Date |
|----------------|---------|---|--|
| 1.0 | K Coupe | New policy in line with requirements of Group Constitution 2019 and recommended by the Charity Commission | 18 June 2024 Committee Member (C Crew) |