

## General Welfare Requirement: Documentation

Providers must maintain records, policies and procedures required for the safe and efficient management of the settings and to meet the needs of the children.

## Record keeping

### 5.9 Cloud Computing Services

#### Statement of Intent

At St Joseph's Pre-school 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 Pre-school's Privacy Notice in the enrolment pack they receive for their child. All staff receive a copy of the Pre-school's Staff Privacy Notice.

#### Aim of Policy

This document sets out St Joseph's Pre-school'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 Pre-school.

#### 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 as 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 Pre-school uses the services of GDrive attached to the pre-school email address'. GDrive is a personal cloud storage<sup>1</sup> 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 Office<sup>2</sup> 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**."

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<sup>1</sup> Though is considered as a public cloud service too.

<sup>2</sup> [www.ico.org.uk](http://www.ico.org.uk)

When using a GDrive, the organisation (St Joseph's Pre-school) 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 2018<sup>3</sup>. 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/](http://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 Pre-school, Treasurer, Treasury Administrator and Lead Practitioner's email address', is reviewed annually to ensure it is kept in line with GDPR/DPA requirements, statutory requirements and our Retention Period for Records<sup>4</sup> 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 Pre-school 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 Pre-school, 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 Pre-schools existing ICT policy<sup>5</sup>.
- 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.

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<sup>3</sup> Policy 5.4 Data Protection

<sup>4</sup> Policy 5.7

<sup>5</sup> 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 Pre-school email address, is via username and password system. Access is restricted to two staff members and two committee members. The Chair is responsible for ensuring that the password is changed annually, ie. after the Annual General Meeting, and access is reviewed annually too.

Access to the GDrive attached to the Treasurer’s email address, is via username and password system. Access is restricted to the Treasury Administrator.

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
- General Data Protection Regulations (2018)
- Data Protection Act 2018

### Associated Policies and Procedures

- 5.4 Data Protection
- 5.5 Data Subject Access Requests
- 5.6 Data Breaches
- 5.7 Retention of Records Period
- St Joseph’s Pre-school’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	13 July 2021 Chair (A Hitchings)
2.0	K Coupe	Reviewed and updated re Google compliance to GDPR and change of heading	30 Nov 2022 Cttee Mbr (L Finn)
3.0	K Coupe	Reviewed and updated • information about certain email addresses and access and the use of “shared” files.	7 June 2024 Cttee Mbr (L Finn-Powers)