

Privacy Notice for Hub Participants and Professional Contacts

How we use personal information when you engage with the Greater Lincolnshire Early Years Stronger Practice Hub

Effective from	16 September 2026
Review date	September 2027, or earlier if the programme or processing changes
Local data controller	Lincolnshire Maintained Nursery School Federation
National programme data controller	Department for Education

About this notice

This notice explains what personal information we collect and use when early years providers, childminders, practitioners, local authority colleagues, delivery partners and other professional contacts engage with GLEYSPPH. This includes membership, surveys, events, networks, newsletters, enquiries, funded professional development, Early Years Stronger Practice Adviser support and Early Years Learning Lead activity.

It should be read alongside the Department for Education privacy notice for the national Early Years Stronger Practice Hubs programme. Separate LMNSF privacy notices apply to employees, applicants, pupils, parents and school visitors where information is processed for those purposes.

Who we are and who controls your information

GLEYSPPH is led by Gainsborough Nursery School on behalf of the Lincolnshire Maintained Nursery School Federation (LMNSF). It supports early years providers and childminders across Lincolnshire, North Lincolnshire and North East Lincolnshire. The programme is funded by the Department for Education (DfE), with Ambition Institute acting as the national delivery partner.

Lincolnshire Maintained Nursery School Federation is the data controller for personal information it collects and uses to administer and deliver GLEYSPPH locally.

The Department for Education is a separate data controller for information processed as part of the national Early Years Stronger Practice Hubs programme, including information used for programme oversight, monitoring, assurance and evaluation. Further information is available in the [Department for Education Early Years Stronger Practice Hubs privacy statement](#). Ambition Institute and other organisations may process information on behalf of the DfE or LMNSF, depending on the activity. Each controller is responsible for its own processing.

Our contact details

Lead setting	Gainsborough Nursery School, North Marsh Road, Gainsborough, Lincolnshire, DN21 2RR
Data Protection Officer	Satswana Ltd, Suite G12, Ferneberga House, Alexandra Road, Farnborough, GU14 6DQ
DPO email	admin@satswana.com
GLEYSPPH administrative contact	Rebecca Walker, GLEYSPPH Administrator

The information we may collect

The information collected depends on how you engage with the Hub. It may include:

- your name, job title or professional role, employer, setting or organisation
- work or personal contact details that you choose to provide, including email address, telephone number and postal address
- setting information, such as provider type, postcode, local authority area, Ofsted unique reference number, registration status and characteristics relevant to programme eligibility or reach
- your Hub membership, mailing preferences and record of consent
- event, webinar, network and professional development bookings, attendance and participation
- accessibility, dietary or other reasonable-adjustment information that you choose to provide
- survey responses, feedback, evaluation responses and expressions of interest
- enquiries, correspondence, meeting notes and records of support requested or provided
- information about a setting's strengths, priorities, improvement needs, action plans and engagement with EYSPA or EYLL support
- photographs, audio or video recordings, quotations and case-study material where appropriate permission has been obtained
- financial or payment information for commissioned work, grants, expenses or programme administration
- technical and usage information generated when you use our websites, forms, booking, email or online meeting systems, including IP address, device information and audit records where collected by those systems.

Information about children

GLEYSPPH normally needs setting-level and workforce information, not identifiable information about individual children or families. Please do not include children's names, dates of birth, images, case files or other identifying details in routine surveys, emails, event discussions or support records. If an exceptional activity requires child-level information, we will explain the purpose, lawful basis, security arrangements, recipients and retention period before it is collected. Settings remain responsible for ensuring that any information they disclose to the Hub is lawful and limited to what is necessary.

Safeguarding concerns

If information received through a Hub activity raises a concern about the safety or welfare of a child or adult, we will follow the relevant LMNSF safeguarding and child protection procedures. We may record the concern and share relevant information with the individual's setting, designated safeguarding lead, local authority children's or adult services, the police or another appropriate safeguarding agency. Information will be shared only where it is necessary and proportionate to protect someone from harm or to meet a legal obligation. Where appropriate, information may be shared without consent.

The lawful bases will normally be legal obligation under Article 6(1)(c), vital interests under Article 6(1)(d) in an emergency, or public task under Article 6(1)(e). Where special category information is involved, we will rely on an appropriate Article 9 condition, normally substantial public interest under Article 9(2)(g), together with the relevant safeguarding condition and safeguards in Schedule 1 of the Data Protection Act 2018.

Special category and sensitive information

We do not routinely seek special category data. We may receive limited information about health, disability, ethnicity, religion or other protected characteristics where you provide it for accessibility, equality monitoring, safeguarding or an agreed case study. We will collect only what is necessary. Depending on the purpose, the Article 9 condition will normally be explicit consent under Article 9(2)(a), vital interests under Article 9(2)(c), or substantial public interest under Article 9(2)(g) together with an applicable condition and safeguards in Schedule 1 of the Data Protection Act 2018. Where explicit consent is used, you may withdraw it at any time. Criminal offence data is not routinely collected under this notice.

Where we obtain information

We may obtain information:

- directly from you through forms, surveys, bookings, emails, meetings, telephone calls, events and support activity
- from your setting, employer or commissioning organisation
- from local authorities, the DfE, Ambition Institute, other Stronger Practice Hubs or delivery partners where sharing is lawful and necessary
- from public sources, such as Ofsted's register, setting websites and professional directories
- automatically through the digital systems used to provide Hub services.

Why we use information and our lawful bases

We only use personal information where data protection law permits it. The table below explains the main purposes and lawful bases. More than one basis may apply where activities overlap.

Purpose	Lawful basis
Manage Hub membership, provider relationships, enquiries, expressions of interest and support requests	Public task - Article 6(1)(e): delivering the DfE-funded public programme. Contract - Article 6(1)(b) where steps are requested before, or are necessary to perform, an agreement.
Administer events, networks, webinars, funded professional development, EYSPA and EYLL activity	Public task - Article 6(1)(e). Contract - Article 6(1)(b) where a booking or participation agreement applies.
Monitor participation, reach, quality, outcomes and value for money; provide management information, assurance and evaluation	Public task - Article 6(1)(e). Legal obligation - Article 6(1)(c) where records are required by law, audit or grant conditions with legal effect.
Send operational messages about an activity you have booked, requested or joined	Public task - Article 6(1)(e) and, where relevant, contract - Article 6(1)(b). These are service messages rather than optional marketing.
Send newsletters and optional updates about future opportunities	Consent - Article 6(1)(a), together with the Privacy and Electronic Communications Regulations where applicable. You can unsubscribe at any time.
Use photographs, recordings, named quotations or identifiable case studies for publicity or resources	Consent - Article 6(1)(a), unless another basis is clearly explained before collection.

Purpose	Lawful basis
Pay suppliers, advisers or contributors; maintain financial and audit records	Contract - Article 6(1)(b); legal obligation - Article 6(1)(c); and public task - Article 6(1)(e).
Protect systems, prevent misuse, respond to complaints, establish or defend legal claims and keep people safe	Legal obligation - Article 6(1)(c); public task - Article 6(1)(e); vital interests - Article 6(1)(d) in an emergency. Legitimate interests - Article 6(1)(f) may apply only to activities that do not form part of LMNSF's public tasks.

The public task is the delivery, administration, monitoring and evaluation of the national Early Years Stronger Practice Hubs programme in support of the DfE's education functions. Where we rely on consent, refusal or withdrawal will not affect access to core Hub services unless the information is necessary to provide the specific optional feature requested.

Who we may share information with

We share only information that is necessary, proportionate and lawful. Recipients may include:

- the Department for Education for programme governance, assurance, monitoring, evaluation, research and grant administration
- Ambition Institute as the DfE's national delivery partner
- Lincolnshire County Council, North Lincolnshire Council and North East Lincolnshire Council where needed to coordinate support, understand local need, confirm eligibility, avoid duplication or evaluate reach
- LMNSF schools, GLEYSPPH strategic and delivery partners, Early Years Stronger Practice Advisers, Early Years Learning Leads, trainers, consultants and other Stronger Practice Hubs where they are involved in an activity
- event venues and suppliers that need limited booking or accessibility information
- providers of IT, website hosting, online meetings, forms, booking, email, customer relationship management, document storage and survey services acting under contract
- a setting's designated safeguarding lead, local authority children's or adult services, the police or another appropriate safeguarding agency where a concern arises
- auditors, professional advisers, insurers, regulators, law enforcement bodies, courts or other public authorities where required or permitted by law.

We use written agreements and data protection clauses where another organisation processes information on our behalf. We do not sell personal information. Reports and publications will use anonymised or aggregated information wherever possible.

National programme information

The DfE explains its processing for the national programme in its [Early Years Stronger Practice Hubs privacy statement](#). That notice should be read alongside this one where information is supplied to the DfE or its delivery partner.

International transfers

We aim to keep personal information within the United Kingdom. Some contracted technology providers may store or support information from another country. Before making a restricted transfer, LMNSF will ensure that an adequacy regulation applies or that appropriate safeguards are in place, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, and any required transfer risk assessment. You may ask the Data Protection Officer for information about the safeguard used.

How long we keep information

We keep information only for as long as needed for the purpose collected, the DfE grant and assurance requirements, applicable limitation periods, and the LMNSF records retention schedule. The usual periods are set out below. A longer period may apply where records are subject to an audit, complaint, safeguarding concern, legal hold or investigation.

Record	Usual retention period or criterion
Mailing-list records	Until you unsubscribe or the list is closed. A minimal suppression record may be retained to ensure that we honour an opt-out.
Unsuccessful or abandoned event bookings and routine enquiries	Normally up to 3 years after the last contact, unless needed for an ongoing matter.
Event attendance, membership, survey, evaluation and programme participation records	Normally 6 years after the end of the relevant programme year or grant period, where required for monitoring, audit and assurance; then deleted or anonymised.
EYSPA, EYLL and other targeted support records	Normally 6 years after the support ends or the relevant grant period closes, unless a shorter period is agreed or a longer period is required for an active matter.
Contracts, payments, expenses and grant or audit evidence	6 years after the end of the financial year or contract, unless tax, audit, grant or legal requirements require longer.
Consent for photographs, recordings, quotations and case studies	For the stated use and review period. Published material may remain available, but future use will stop where consent is withdrawn and removal is reasonably practicable.
Online meeting recordings and transcripts	Only where recording is necessary and participants have been informed; retained for the stated purpose and normally no longer than 12 months unless incorporated into an approved resource or required as evidence.

Keeping information secure

LMNSF uses appropriate technical and organisational measures to protect personal information from accidental or unlawful loss, alteration, disclosure or access. Measures include access controls, secure systems, staff training, data minimisation, contractual controls, incident management and secure deletion. Access is limited to people who need the information for their role.

Automated decision making

We do not make decisions about you that have legal or similarly significant effects using solely automated processing. If this changes, we will provide the information required by law before the processing begins.

Your data protection rights

Depending on the circumstances and lawful basis, you may have the right to:

- be informed about how your personal information is used
- ask for access to your personal information and receive a copy
- ask us to correct inaccurate or incomplete information
- ask us to erase information where the right applies
- ask us to restrict the use of information where the right applies

- object to processing based on public task or legitimate interests, including an absolute right to object to direct marketing
- receive information you provided in a portable format where processing is based on consent or contract and carried out by automated means
- withdraw consent at any time, without affecting processing that was lawful before withdrawal
- ask for human intervention where a significant decision has been made solely by automated means.

These rights are not absolute and exemptions may apply. We will normally respond within one month after receiving a valid request and any information reasonably needed to confirm identity or clarify the request. School holidays do not extend the legal deadline, although the law allows an extension for a complex request or multiple requests where the individual is informed within the first month. There is normally no charge.

How to exercise your rights or raise a concern

Contact the Data Protection Officer using the details in this notice. Please describe the information or concern clearly so that it can be directed to the right person. We would welcome the opportunity to resolve any concern first.

You also have the right to complain to the Information Commissioner's Office. Visit ico.org.uk/make-a-complaint, call 0303 123 1113, or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Changes to this notice

We will review this notice when the Hub's services, systems, partners, legal requirements or DfE programme arrangements change. The current version will show its effective date. Where a change significantly affects how existing information is used, we will take reasonable steps to bring it to the attention of affected people and seek fresh consent where required.

Related privacy information

[DfE Early Years Stronger Practice Hubs privacy statement](#)

[DfE personal information charter](#)

[Information Commissioner's Office guidance on the right to be informed](#)