



## SEVENOAKS DAY NURSERY

### Consideration of whether to appoint a Data Protection Officer

As required by the General Data Protection Regulations (GDPR), Sevenoaks Day Nursery considered whether it was legally obliged to appoint a Data Protection Officer (DPO) with effect from 25 May 2018. Consideration was also given to whether the Nursery should voluntarily appoint a DPO if this was not legally required.

Under the GDPR, an organisation must appoint a DPO if:

- It is a public authority or body (except for courts acting in their judicial capacity);
- Its core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); or
- Its core activities consist of large-scale processing of special categories of data or data relating to criminal convictions and offences.

The Nursery's business is to provide all day childcare to approximately 50 children under the age of 5 as well as running a holiday club for children up to the age of 13. Based on this, the Nursery does not consider that it meets any of the three criteria listed above.

In addition, the Nursery does not consider that it needs to voluntarily appoint a DPO given the level of personal data that it processes.

The Nursery Manager will lead on ensuring the Nursery and its staff meet their requirements under UK GDPR and data protection legislation. The Nursery's Trustees will provide data protection governance.

This policy was adopted by the Trustees of Sevenoaks Day Nursery CIO on 15<sup>th</sup> May 2024.

Susan Dreksler  
Chair