



## Privacy Policy

Your privacy is important to InspireAll Leisure and Family Support Services (InspireAll). This statement explains the personal information InspireAll processes, how it processes and why.

Sometimes we will update this policy to make it clearer or to keep up with changes. Changes might be a new service, a different way of using your personal data or a change in the law. This policy was last updated 21<sup>st</sup> February 2022.

Through our Family Centres and Starjumps Nurseries we run activities and services to help your children and your family to be healthy, grow and develop.

If you use our Leisure Centres or our Theatre, our Leisure Privacy Policy explains which information about you we collect and what we use it for. If you would like to have a copy please visit our website [www.inspireall.com/privacy-policy](http://www.inspireall.com/privacy-policy) or ask a member of staff for a copy.

If you are employed by InspireAll or are a volunteer and want to know how we use your information then please ask to see InspireAll's Employee Privacy Policy.

## Your privacy is important to us

When you use our services we collect and use certain information about you. This information, like your name and email address, is called personal data. We want you to know what personal data we have about you and your family, and how we use it. We also want you to know that you have rights over that data.

We protect your data and we will never sell it. We make sure we comply with data protection laws like the UK General Data Protection Regulation 2018 (UK GDPR) and the Data Protection Act 2018 (DPA).

If you have any questions please speak ask a member of staff or contact our Data Protection Officer:

dpo@inspireall.com

Data Protection Officer

InspireAll Leisure and Family Support Services

The Venue



Elstree Way  
Borehamwood WD6 1JY

InspireAll Family Support Service is a part of InspireAll Leisure & Family Support Services, a UK registered charity no. 1093653 and a company limited by guarantee no. 4343347. Our registered office is The Venue, Elstree Way, Borehamwood, Herts WD6 1JY.

Hertfordshire County Council is the data controller for Hertfordshire Family Centres and InspireAll provides Family Support Services as one of its processors.

The council's address is: Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DE

InspireAll Family Support Service also manages Starjumps Nurseries in Borehamwood and Potters Bar.

Our head office is:

InspireAll Leisure and Family Support Services  
The Venue  
Elstree Way  
Borehamwood  
Hertfordshire, WD6 1JY.

This policy applies to:

- Families registered with Hertfordshire Family Centres
- Families using InspireAll Family Support Services
- People visiting InspireAll Family Centres
- Children attending Starjumps Nurseries and their families/carers
- People visiting Starjumps Nurseries

## Which information do we collect?

**When you use or visit one of our Family Centres and you:**

**Book a place on a session:**

Your name and contact details

**Pay for a session:**

Your payment card details if you pay by credit or debit card details

**Attend a session:**

Your name, your child's name, your postcode, your contact details

**Attend a meeting or sign into a building:**

Your name and contact details

**Borrow equipment like Home Learning Bags:**

Your name and contact details

**Work with the Family Support Service:**

A record of the support we have given you

**Complete a course evaluation:**

What you think of our sessions and activities

**Sign up to get a newsletter or handouts from a session or activity:**

Name and contact details

**Contact us:**

Your name and contact details, details of what you have said and what we said in reply.

If we take photographs or make films we will have pictures or films of you and your family.

**If you register with the Hertfordshire Family Centre Service they will give us this information about you and your family:**

**For you and any other carers:**

Name, gender, date of birth, contact details, relationship to child, ethnicity, fluency of English, employment status, claiming benefits, disabled or suffering a long term illness, smoking status, pregnancy status

**For your child or children:**

Name, gender, date of birth, NHS number, ethnicity, disability or long term illness.

If you would like more information about this please visit <https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx>

**The NHS, Hertfordshire County Council, Schools, Early Years Education Providers might share information about you and your family with us.**

This Information will be about any support needs you and your family may have and your contact details. Unless there is a legal reason for your information to be passed to us, your information will not be shared without your consent.

**When you use or visit one of our Nurseries and when:**

**You tell us you might want your child to join one of our nurseries:**

For you or a carer:

Name, contact details

For your child:

Name, address, date of birth, religion, ethnicity, nationality, language spoken

**Your child attends one of our nurseries**

For you or a carer:

Name, contact details, photograph or proof of id, national insurance number (to support claims for early years funding), 2 years funding reference number, 30 hours funding reference number

For the authorised adult collecting your child from nursery:

Name, contact details, photograph or proof of id

For your child:

Name, address, date of birth, NHS number, birth certificate reference number and date of issue (to support claims for early years funding), details of people to contact in an emergency (names, contact details), details of vaccinations, details of any medications that might be taken at home or might need to be administered at nursery, details of medical conditions, allergies, disabilities and/or special educational needs, any distinguishing marks, food allergies/intolerances, photographs (taken during sessions, subject to parental/carer permission), written observations of their learning and development

**You pay for family centre or nursery sessions**

Credit card details or bank account details if you pay by direct debit

**You sign up to receive a newsletter**

Name and contact details

**When you visit one of our nurseries**

Name and telephone number

## **CCTV**

We use closed circuit television (CCTV) images to stop crime happening and if it does happen, to try to see who might be carrying it out. We also use it to keep people safe when they are on our premises and to make sure our policies are being followed.

At some of our Family Centres we might use door entry systems that use CCTV. If we are using them we will have signs up to let you know.

If you want to know more about how we do this, please ask to see our CCTV Code of Practice.

## **Why do we collect your information?**

We collect your information so we can provide you with services tailored to your needs and the needs of your family. We make sure we only collect your information if the law allows us to.

These are the different reasons we are allowed to collect your information:

**Consent** (when you say we can collect and use your information, you can change your mind at any time –just let a member of staff know or email our Data Protection Officer at [dpo@inspireall.com](mailto:dpo@inspireall.com))

- You allow us to take a photo or video that is used to identify you
- You share information with family support workers so they can best support you
- You allow us to share your information with others, like charities or schools
- We also collect information when you complete customer surveys, provide feedback and take part in competitions.

**Contract** (when we provide you with a service or activity)

- When you book an activity or service we collect and store personal information in order to provide you with what you have booked.
- When you pay by debit or credit card we have to collect and use your card details to complete the transaction.

**Legitimate Interest** (when we use your information to do things you would expect us to)

- We look at which activities are the most popular or if an activity needs to be moved because no one is coming
- We keep you up-to-date about the Nursery services we offer
- We provide an online learning journal for parents/carers of Nursery children to look at
- We let you know if there is a problem, for example if a session is not running
- We let you know about something you have asked about

- We look to see if there are any risks to our staff if they visit you in your home.
- We contact you if you have attended one of our sessions but you are not a Family Centre Service member to see if you would like to register.
- If you have nominated a member of staff for an award we might contact you about it.
- When we take photos or film events to promote our services we might collect your personal information and share it with our designers and selected promoters.
- When we capture your image on CCTV for prevention and detection of crime, safeguarding staff and visitors and ensuring compliance with health and safety procedures.

**Legal Obligation** (When we have to pass on your information because the law says we have to)

- We have to pass on your information if we think you or your family, or someone working with you could come to harm. We will do this in line with our Safeguarding for Childcare Professionals policy.
- We register you with the Family Centre Service.
- If you make a request under the DPA 2018 or UK GDPR 2018 we will use your personal information in order to comply with the law.
- We have to provide your personal information if we get a legal request for it –for example from HMRC for tax purposes or NHS Test and Trace.

**Automated decision making and profiling** (is a decision made automatically, without anyone being involved). InspireAll will only this when the law allows.

## When we might share your information

We will never sell your information. However we may share your information with other organisations (we will always make sure your information is safe).

This is when we might share your information:

### **When you join the Family Centre**

The Family Centre Service is run by the council with InspireAll. Health Visitors and School Nurses are also part of the service. When you join the Family Centre your information will be shared with Hertfordshire County Council and may be shared with the rest of the service.

We may share you and your children's names and contact details and other information that is needed to provide you and your family with support, services or activities

If you would like more information about this please visit <https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx>

#### **When your child attends one of our nurseries**

- We use nursery management software to manage your children's records at when they come to one of our nurseries.

We will share your contact and payment details, and your child's date of birth, health & disability data, ethnicity, religion, and gender.

- We also use online journal software to share your child's progress with you, and so you can share information about them with us.

We will share your name and email address, your child's name, date of birth, information about your child and photos of your child.

- We will share your child's development with their next nurse or school (if you have given us permission).

#### **When we collect payments**

If you pay for your Nursery sessions by Direct Debit we will pass your details onto a company who helps us collect our nursery fees. If you pay for sessions or activities by credit or debit card we will share your card details with payment card processors. We might also share your contact and account details with debt collection agencies.

#### **If we think you, your family and those working might not be safe**

If we think you, your family and those working with you are not safe we have to tell someone. Our Safeguarding for Childcare Professionals policy explains how we do this.

#### **When the law tells us we have to share your information**

Sometimes we have to pass on your information because the law tells us to. This can be because the government wants some information about you or there might be a court case about you. If you have asked for a copy of your information, or for it to be erased, we might have to contact other organisations who we have shared it with.

#### **When we advertise our sessions and activities**

If you have said it is ok, we will share your information with companies who will send you emails about our sessions and activities. You can opt-out at any time by 'unsubscribe' which is included in all our texts and emails to you.

#### **If you have an accident**

If you or your child has had a serious accident we will upload details to our health and safety database. We may have to share the details of the accident with our insurers.

**If you nominate a member of staff for a WOW Award**

We will share your nomination with WOW and we will contact you about it. If you have given permission, your name may be used on a certificate and online.

**When we report to organisations that provide InspireAll with funding**

We have to show the organisations that fund us how we spend their money. We give them reports but they don't identify you. If you do not want your information to be included in these reports email [dpo@inspireall.com](mailto:dpo@inspireall.com)

**If we are contacted by NHS Test and Trace as part of a tracking exercise**

If someone has tested positive for COVID-19 after visiting our premises or attending one of our services.

## How we protect your information

Protecting your information is very important to us. Staff are only allowed to access your information if they have a valid reason to. We have taken steps to stop your information from being accidentally lost, used or accessed by anyone who shouldn't. If this happens, we have plans in place to deal with it. All staff have regular data protection training.

If the law says we have to, we will let you, and the right authorities, know if we think we have had an 'information security breach' –this is when information has been lost, shared when it shouldn't have been or accessed by someone who wasn't allowed to have it.

We might send your information to countries outside the UK. If we do, we will make sure it is as protected as it would have been in the UK.

**Children's personal information**

Our services are used by people of all ages. Children aged under 16 years must have a parent or guardian's consent before providing personal information to us unless we believe there is a safeguarding risk to them, their family or someone working with them.

## How do long we keep your information?

We will only keep your information for as long as it is needed. InspireAll supports you from before your child is born until your youngest child is 11 years old. Once your personal information is no longer needed it will be securely disposed of.

Starjumps Nurseries keep most records for 3 years after your child leaves the nursery. We might have to keep certain information for longer, such as:



- Information regarding keeping children safe ('safeguarding' information).
- Information regarding accidents or medical/health conditions.
- Financial information

Hertfordshire County Council's Family Services Commissioning team keeps Family Support Service membership records for 25 years.

## Your rights

You have rights over your information. Please contact our Data Protection Officer if you have a request (sometimes we won't be able to do as you ask but we will explain why):

[dpo@inspireall.com](mailto:dpo@inspireall.com)

Data Protection Officer  
InspireAll Leisure and Family Support Services  
The Venue  
Elstree Way  
Borehamwood WD6 1JY

### **Correct Information**

We will try to make sure that the information we have about you is correct. If you believe it is out of date or wrong, please let us know (see below).

### **Seeing your information – subject access request**

You have a right to a copy of the information we have about you. This is called a Subject Access Request.

### **Removing your information**

If you agreed to share your information with us, or with another organisation and don't want to share it anymore, please let us know (see below).

### **Stopping us from using your information**

If you want us to stop using your information but don't want us to get rid of it we will restrict its use unless we have a legal duty to continue to use it, are using it to defend any legal claims or it is needed for keeping someone safe.

### **Objecting to your information being used**

You have the right to stop to your information being used for direct marketing. You can also object to your information being used for:

- statistical purposes (when we collect information to find out who is using our service, usually we can't tell who the information was from),
- our legitimate interests (when we do something you would expect us to do)
- and for a task being carried out in the public interest (if we are doing something on behalf of local government).

## Changes of business ownership and control

InspireAll might expand or reduce its business (including its nurseries or family centres). If this happens part, or all of InspireAll, may be sold or transferred to another owner.

If we have to, we will transfer your personal information to the new owner. They will be able to use your information for the same reasons as you originally gave it to us.

We may also share your information with an organisation or individual who may want to buy InspireAll or run its nurseries or family centres.

At the end of our contract to run the family support service on behalf of Hertfordshire County Council all your personal information will be transferred to them or a new family support service provider.

We will always take steps to make sure your privacy is protected.

## All about cookies

Our website uses cookies to collect information about you. Cookies are pieces of information placed on your computer to allow websites to recognise you when you visit. They collect information about what you look at and what you click on but do not identify you as an individual.

We use the information gathered from cookies to get an idea of which parts of the website work best and what could be improved.

We also use cookies to find out how effective our electronic communications are.

For more information about cookies, please visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases, some of our website features may not work as a result.

## Other websites

Our website contains links to other websites. This privacy policy only applies to the InspireAll website.

Please read each company's policy when using their website. We cannot be held responsible for the privacy policies and practices of other websites.

## How to complain

If you have any questions, concerns or complaints, or if you would like more information about anything mentioned in this privacy policy, please contact our Data Protection Officer:

Data Protection Officer  
InspireAll  
The Venue  
Elstree Way  
Borehamwood WD6 1JY.

[dpo@inspireall.com](mailto:dpo@inspireall.com)

We take any complaints about our collection and use of information very seriously.

If you think that our collection or use of information is unfair, misleading or inappropriate, or have any other concern about our information processing, please let us know.

Alternatively contact the Information Commissioner's Office:

- Report a concern online at <https://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

This policy will be updated as necessary to reflect best practice and to ensure compliance with any changes or amendments to relevant legislation.