

Issue 7

### Your privacy is important to us

Your privacy is important. Our Privacy Policy tells you which information about you we collect and what we use it for. We will take care of your information, make sure it is protected and we will never sell it.

We run activities and services to help children, young people and their families to be healthy, grow and develop.

Starjumps Nurseries offer care and learning tailored to your child's individual needs, to help them be healthy, grow and develop.

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 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).

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. When we change it, we will change the date at the bottom of each page of this document.

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

dpo@inspireall.com 07785 462 593

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.

February 2023 Page 1 of 17



**Issue 7** 

Hertfordshire County Council is the data controller for Hertfordshire Family Centres and InspireAll provides Family Support Services as one of its processors (this means that we run family centres on behalf of the council).

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.

If you use our Leisure Centres or our Theatre, we have Privacy Policies that explain which information about you we collect and what we use it for. If you would like to have a copy please visit our website <a href="https://www.inspireall.com/privacy-policy">www.inspireall.com/privacy-policy</a> or ask a member of staff for a copy.

#### This Privacy Policy explains:

- 1. Information we collect from you
- 2. Why we collect your information
- 3. When we might share your information
- 4. How we protect your information
- 5. How we long we keep your information
- 6. Your rights
- 7. Changes in business ownership and control
- 8. All about Cookies
- 9. Other Websites
- 10. Changes to our privacy policy
- 11. How to complain

Back to top

February 2023 Page 2 of 17



**Issue 7** 

## 1. Information we collect about you

### **The Family Support Service**

We collect information from you when you use our services:

When you use or visit one of our Family Centres	The information we will collect
Book a place on a session	Your contact details
Pay for a session	Your credit card details
Attend a session face to face	Your name and your child's name and postcode, your telephone numbers
Attend a session online	Your name, your child's name, your postcode and your email address
Sign into a building	Your name, your telephone numbers
Attend a meeting	Your name, your telephone numbers
Borrow resources such as Home Learning Bags	Your contact details
Receive outreach support	A record of the support we have given you and your family
Complete a course evaluation	Your opinion of our sessions and activities
Sign up to receive a newsletter or resources from a session or activity	Name and contact details
Contact us	Your names and contact details and copies of what you have said and what we have said in reply.
Take photographs or make films	Your picture or image in a film

February 2023 Page 3 of 17



**Issue 7** 

### We might also get information about you from these places:

We use this information to help you and your family get the best from our services.

Hertfordshire Family Centre Service	When you register with the service:  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 <a href="https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx">https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx</a>	
NHS, Hertfordshire County Council, Schools, Early Years Education Providers,	Information about any support needs you and your family may have, your contact details.	
	In most cases your information will not be shared without your consent.	

We might also get your information when we visit local parent and toddler groups and other community groups or events. We might collect your contact details and information you give us about any support needs you and your family may have.

February 2023 Page 4 of 17



**Issue 7** 

## When you use or visit one of our Nurseries

This table shows the different times we collect your information and the different sort of information we collect:

When you use or visit one of our	The information we will collect
Starjumps Nurseries	
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
When 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
When you pay for	Credit card details or bank account details if you pay by
nursery sessions	direct debit
When you sign up to receive a newsletter	Name and contact details
When you visit one of our nurseries	Name and telephone number

We also collect information from anyone who supplies us with products or services. This would include your contact information. We use this to manage the orders we have placed with you.

February 2023 Page 5 of 17



**Issue 7** 

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.

#### Back to top

### 2. Why we collect your information

We collect your information so we can run Family Centre services or Nursery services and so that we comply with current legislation.

We make sure we only collect your information if the law allows us to.

This table shows you the different reasons we are allowed to collect your information.

Why we can collect your information	Examples		
Consent  When you say we can collect and use your	<ul> <li>You allow us to take a photo or video that is used to identify you</li> </ul>		
information.	<ul> <li>You share information with family support workers so they can best support you</li> </ul>		
<ul> <li>You can change your</li> <li>mind at any time –just</li> <li>let a member of staff</li> <li>know or email our Data</li> </ul>	<ul> <li>You allow us to share your information with others, like charities or schools</li> </ul>		
Protection Officer at dpo@inspireall.com	<ul> <li>We also collect information when you complete customer surveys, provide feedback and take part in competitions.</li> </ul>		
Contract  • When we provide a service to you	<ul> <li>We collect and use your information when you book onto an activity or pay for one</li> </ul>		
When we order products or services from you	<ul> <li>When you pay by debit or credit card we have to collect and use your card details to complete the transaction.</li> </ul>		

February 2023 Page 6 of 17



Issue 7

	<ul> <li>When we order services or products from you we collect and store personal information so we can you about your order and to make sure we carry out our contract with you.</li> </ul>
Legitimate Interest  • When we use your information to do things you would expect us to.	<ul> <li>We look at which activities are the most popular or if an activity needs to be moved because no one is coming</li> </ul>
you would expect us to.	<ul> <li>We keep you up-to-date about the Nursery services we offer</li> </ul>
	<ul> <li>We provide an online learning journal for parents/carers of Nursery children to look at</li> </ul>
	<ul> <li>We photograph large groups of people (when we aren't taking the photo to identify people)</li> </ul>
	<ul> <li>We let you know if there is a problem, for example if a session is not running</li> </ul>
	<ul> <li>We let you know about something you have asked about</li> </ul>
	<ul> <li>We look to see if there are any risks to our staff if they visit you in your home.</li> </ul>
	<ul> <li>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.</li> </ul>
	<ul> <li>If you have nominated a member of staff for an award we might contact you about it.</li> </ul>
	<ul> <li>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.</li> </ul>

February 2023 Page 7 of 17



**Issue 7** 

	<ul> <li>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.</li> </ul>
Legal Obligation  When we have to pass on your information because the law says we have to.	<ul> <li>If you have an accident when using our facilities, we have to record your details and the details of the accident to comply with health and safety law.</li> </ul>
	<ul> <li>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.</li> </ul>
	<ul> <li>We register you with the Family Centre Service.</li> </ul>
	<ul> <li>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.</li> </ul>
	<ul> <li>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.</li> </ul>

Back to top

February 2023 Page 8 of 17



**Issue 7** 

## 3. 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 table shows you the different times when we may share your information:

When we might share	What this means	
your information When you join the Family Centre	The Family Centre database is run by Hertfordshire County Council.	
	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.	
	If you would like more information about this please visit <a href="https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx">https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx</a>	
Collecting nursery payments	If you pay for your Nursery sessions by Direct Debit we will give a company called Harlands your details so they can collect your payments on our behalf.	
	We will pass your details onto a company who helps us collect our nursery fees	
Making sure you, your family and those working with you are 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.	
Making sure we do what the law tells us we have to	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 or someone in your family has had an accident at one of our sessions or when visiting	If you or someone in your family has had an accident the law says we have to record what has happened. We do this on a health and safety database.	
us, or if you have witnessed one.	We might have to pass information about the accident to our insurers.	

February 2023 Page 9 of 17



Issue 7

	If you witnessed an accident we might take your contact details and record them with the accident in case we need to ask you about what happened.
If we get funding from organisations to run services	We have to give funding reports to organisations that have given us money for services. You cannot be identified in these reports.
	If you do not want your personal information to be in these reports, please tell a member of staff or email our Data Protection Officer <a href="mailto:dpo@inspireall.com">dpo@inspireall.com</a>
Advertising 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 'unsubscribing' which is included in all our texts and emails to you.
If 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.

#### Back to top

## 4. 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.

February 2023 Page 10 of 17



Issue 7

We want everyone to understand how we use their information so if you are a young person under 18, or if you are a parent or carer of a young person under 18, we have written 'Privacy for Young People Under 18 using Family Centres or Nurseries' to help make it clear.

Please ask a member of staff if you would like a copy.

Back to top

### 5. How 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.

Back to top

February 2023 Page 11 of 17



**Issue 7** 

## 6. Your rights

You have rights over your information:

Your rights	What this means for you		
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 the right to know what information we have about you (but you can only have your own information and any child that you have parental responsibility for aged under 13 years old). This is called a Subject Access Request.		
Removing your information	If you agreed to share your information with us, and don't want to share it anymore, please let us know (see below).		
Restricting processing	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:		
	<ul> <li>statistical purposes (when we collect information to find out who is using our service, usually we can't tell who the information was from),</li> <li>our legitimate interests (when we do something you would expect us to do)</li> <li>and for a task being carried out in the public interest (if we are doing something on behalf of local government).</li> </ul>		
Transferring your information	You can ask us to transfer your information to another organisation.		

February 2023 Page 12 of 17



Issue 7

If you want to access your information or ask about any of your rights please contact your Family Centre or you can contact our Data Protection Officer:

dpo@inspireall.com

or write to:

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

Back to top

## 7. 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 or service provider.

If we have to, we will transfer your personal information to the new owner or service provider. 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.

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

Back to top

#### 8. 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 or www.allaboutcookies.org.

February 2023 Page 13 of 17



Issue 7

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.

#### Back to top

### 9. 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.

#### Back to top

### 10. Changes to our privacy policy

We regularly update our privacy policy so please come back and check. This privacy policy was last updated on 1<sup>st</sup> February 2023, in line with guidance from the Information Commissioner's Office, the UK General Data Protection Regulation 2018 and the Data Protection Act 2018.

#### Back to top

## 11. 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

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

February 2023 Page 14 of 17



Issue 7

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

#### Back to top

**Procedure Update:** This procedure is discussed and updated every 2 years or as and when necessary.

#### **Sources of Information**

- Information Commissioner's Office www.ico.org.uk
- UK General Data Protection Regulation 2018
- Data Protection Act 2018

#### Review of changes

Issue	Description of Revision	Issued	Actioned
1	Original issue of policy	Jan 19	BS
2	Review of policy	Nov 19	BS
2	Expanded legal bases for processing people's information, giving examples on page 1	Nov 19	BS
2	Added that InspireAll uses CCTV & refers to CCTV Code of Practice, and that it receives safeguarding information about families on page 3	Nov 19	BS
2	Updated list of information that InspireAll may collect on page 4	Nov 19	BS
3	Review of policy	Apr 20	BS
3	Restructured policy to help families access it more easily. Reviewed language to make it more accessible.	Apr 20	BS
4	Review of policy	Sept 20	BS
4	Added that policy applies when someone visits as well as uses a family centre or a nursery on pages 2, 3 and 4	Sept 20	BS
4	Added that telephone numbers are collected when people attend sessions face to face and which information is collected when people attend meetings on page 2	Sept 20	BS

February 2023 Page 15 of 17



**Issue 7** 

4	Added which information is collected when people visit nurseries on page 4	Sept 20	BS
4	Added that people's details are collected for Test and Trace under legal obligation on page 5	Sept 20	BS
4	Updated annex showing which types of organisations InspireAll might share people's information with on page 9	Sept 20	BS
5	Review of Policy	Nov 20	BS
5	Clarified the use of legitimate interest as a legal basis to photograph large groups of people when the purpose is not to identify people on page 5.	Nov 20	BS
5	Changed references from EU to UK re international data transfers in line with the update to UK GDPR 2018 following Brexit on pages 6 and 8	Nov 20	BS
5	Removed Data Protection Officer's name from contact information on page 8	Nov 20	BS
6	Review of Policy	Feb 22	BS
6	Added hyperlinks and 'back to top' hyperlinks to improve ease of navigation	Feb 22	BS
6	Added explanation of what a privacy policy does in plain English on page 1	Feb 22	BS
6	Separated section 1 into information we collect direct from people and information we collect from other organisations on page 2 and 3	Feb 22	BS
6	Added that name and contact details will be collected when parents sign up to receive resources from a session or activity on page 3	Feb 22	BS
6	Added use of door entry systems that use CCTV on page 5	Feb 22	BS
6	Updated examples of when we rely on different legal bases to process personal information and added contract on pages 5, 6 and 7	Feb 22	BS
6	Added that when you join the Family Centre your information will be shared with Hertfordshire County Council on page 8	Feb 22	BS
6	Added section detailing approach to children's personal information on page 9	Feb 22	BS
6	Added that information about children's medical or health conditions might have to be retained longer than 3 years by Starjumps nurseries on page 9	Feb 22	BS
6	Added section on changes of business ownership and control on page 11	Feb 22	BS
7	Review of policy	Jan 23	BS
7	Made language clearer re when policy is updated (changed reviewed to change) and that there are separate leisure and theatre privacy policies on page 1	Jan 23	BS
7	Added data controller details on page 2	Jan 23	BS
7	Added that people's information may also be collected when staff visit community groups and events on page 4	Jan 23	BS

February 2023 Page 16 of 17



**Issue 7** 

7	Added that we also collect contact information from suppliers on page 5	Jan 23	BS
7	Added that we use the legal basis of contract when we order products or services on page 6	Jan 23	BS
7	Added that we have a legal obligation to record people's details if they have an accident to comply with health and safety law on page 7	Jan 23	BS
	Added that information maybe shared with other organisations if you have an accident or witness one, or if we have to provide funding reports on pages 8 and 9	Jan 23	BS
7	Added that 'Privacy for Young People under18' is available on page 9	Jan 23	BS
7	Added that part or all of InspireAll's services may be transferred to another service provider and if that happens people's personal data will be transferred to them on page 11	Jan 23	BS

February 2023 Page 17 of 17