



PRIVACY & DATA PROTECTION POLICY

CONNECT  GROW  THRIVE



PROTECTING YOUR INFORMATION

Keeping personal
information safe, secure
and confidential.



PEOPLE AT THE HEART

Respecting your privacy
and using information
responsibly.



A SAFER, STRONGER COMMUNITY

Building trust through
transparency, security
and care.

Inspire Community Hub CIC

Privacy & Data Protection Policy

Version: 1.1

Approved by: **Director**

Effective Date: **April 2026**

Next review Date: **April 2027**

Purpose

Inspire Community Hub CIC is committed to protecting the privacy, confidentiality and personal information of everyone who engages with our organisation.

We recognise the importance of handling personal information responsibly and transparently, particularly when supporting adults with disabilities and additional support needs.

This policy explains how Inspire Community Hub CIC collects, uses, stores, shares and protects personal information relating to participants, carers, volunteers, staff, visitors and other individuals who interact with our services.

We are committed to complying with applicable UK data protection legislation, including the UK GDPR and the Data Protection Act 2018.

Our Commitment

Inspire Community Hub CIC is committed to:

- Collecting personal information only where necessary.
- Explaining clearly why information is collected and how it will be used.
- Using personal information fairly, lawfully and transparently.
- Keeping personal information accurate and up to date.
- Protecting information against unauthorised access, loss or misuse.
- Restricting access to individuals who have a legitimate need to know.
- Retaining personal information only for as long as necessary.
- Respecting individuals' rights under data protection legislation.
- Responding appropriately to data protection concerns and incidents.

Information We Collect

Depending on how individuals interact with Inspire Community Hub CIC, we may collect:

Personal and Contact Information

- Full name.
- Town, village or postcode, and home address where required for a specific purpose.
- Email address.
- Telephone number.
- Emergency contact information, where required.

Booking and Attendance Information

- Session bookings and attendance records.
- Names and contact details of carers or support workers.
- Additional information provided through booking forms.

Health and Support Information

- Food allergies and dietary requirements.
- Accessibility requirements.
- Relevant health conditions or additional support needs voluntarily disclosed to us.

Volunteer Information

- Contact details.
- Relevant training and qualifications.
- Emergency contact information.
- Recruitment and safeguarding information, where appropriate.

Photographs and Videos

- Images or recordings taken during Inspire's activities and community events, subject to appropriate permissions and safeguards.

Website and Communication Information

- Information submitted through website forms.
- Emails and other correspondence.
- Information associated with participation in our WhatsApp Community.

- Website usage and cookie information, where applicable.

We will not intentionally collect personal information that is unnecessary for providing our activities and services.

How We Use Personal Information

Inspire Community Hub CIC uses personal information to:

- Process session bookings and manage attendance.
- Communicate with participants, carers and volunteers.
- Organise activities, events and community services.
- Respond to accessibility, dietary and support requirements.
- Support the health, safety and wellbeing of individuals attending our sessions.
- Manage volunteering arrangements.
- Maintain appropriate safeguarding and incident records.
- Respond to enquiries, complaints and feedback.
- Meet legal and regulatory obligations.
- Maintain organisational records and demonstrate the impact of our activities.
- Share photographs or videos where appropriate permission has been obtained.

We may collect participants' town, village or postcode information to understand the geographical areas our services reach, support community planning and evaluate the impact of our activities.

Where possible, geographical information will be used in an aggregated or anonymised format when preparing reports for funders and other stakeholders.

We will not sell personal information to third parties.

Lawful Basis for Processing Personal Information

Inspire Community Hub CIC uses personal information for different purposes. The lawful basis depends on why we need the information. The following describes our proposed approach, subject to confirming and documenting the relevant assessments.

Session bookings and attendance: We rely on legitimate interests to organise sessions, manage attendance and contact participants or those helping them book.

Community reach and funding reports: We rely on legitimate interests to understand which areas participants travel from and to plan and report on our services. Reports will use anonymous or combined information wherever possible.

Photography and publicity: We rely on consent to publish identifiable photographs or videos for promotional purposes. People may refuse or withdraw consent.

Volunteer administration: We rely on legitimate interests to coordinate volunteers and keep necessary records. We rely on legal obligation where particular records are required by law.

Financial records: We rely on legal obligation where information must be kept for accounting, tax or other applicable legal requirements.

Health, allergies, support needs and safeguarding: We identify an appropriate Article 6 lawful basis for each use. Health and other special category information also requires an Article 9 condition. Explicit consent may be used for optional health information where valid consent can be obtained and recorded; it is not assumed merely because a carer or family member made a booking. Safeguarding and genuine emergencies are assessed according to their circumstances.

Bookings Made on Behalf of Participants

Inspire Community Hub CIC recognises that some participants may require assistance from family members, carers or support workers when making bookings.

Bookings may be completed by another person, regardless of whether that person attends the session with the participant.

Where personal information is provided on behalf of another adult, Inspire Community Hub CIC will take appropriate steps to ensure that the information is collected and processed lawfully.

Where consent is required, we will seek valid consent from the participant wherever they have capacity to make the relevant decision, providing appropriate communication support where necessary.

We recognise that family members, carers and support workers do not automatically have authority to provide data protection consent on another adult's behalf.

Where consent cannot appropriately be obtained, we will consider whether another lawful basis and any necessary special category condition applies before processing the information.

Health Information, Food Allergies and Additional Support Needs

Inspire Community Hub CIC may collect relevant information about food allergies, accessibility requirements, medical conditions and additional support needs to help participants access our activities safely and comfortably.

Providing this information through our booking form is optional. We only seek information relevant to the participant's attendance, safety, accessibility or dietary requirements.

Some participants attend with carers or support workers who are familiar with their individual needs. Other participants attend independently, and relevant information may be provided by the participant or, where lawful and appropriate, by a family member or carer.

Where this information constitutes special category personal data, Inspire Community Hub CIC will ensure that an appropriate lawful basis under Article 6 and an additional condition under Article 9 of the UK GDPR apply.

Where we rely on explicit consent, we will ensure that consent is valid, informed and appropriately recorded. We recognise that family members and carers do not automatically have authority to provide consent on another adult's behalf.

Access to sensitive information will be restricted to those who need it to support participants or provide services safely.

Confidentiality and Data Security

Personal information collected through Inspire Community Hub CIC's website booking system is stored within our WordPress website and sent to an authorised organisational email account.

Relevant participant and attendance information may also be maintained in spreadsheets stored securely using Microsoft OneDrive.

Access to these records is restricted to authorised individuals and service providers who require access to perform their responsibilities.

Inspire Community Hub CIC uses an external website management provider to maintain and support its website and booking system. Appropriate confidentiality, security and data protection arrangements will be maintained with service providers processing information on our behalf.

We aim to ensure that:

- Personal information is stored securely.
- Electronic records are protected by appropriate security measures.
- Paper records are kept in secure locations.
- Access is restricted to authorised individuals.
- Personal information is not shared unnecessarily.
- Volunteers and staff understand their confidentiality responsibilities.
- Personal information is disposed of securely when no longer required.

Information relating to health, disabilities, safeguarding or other sensitive matters will be handled with particular care.

Sharing Personal Information

Inspire Community Hub CIC will only share personal information where there is an appropriate and lawful reason to do so.

Depending on the circumstances, this may include sharing information with:

- Emergency services where necessary.
- Relevant safeguarding authorities.
- Healthcare professionals where appropriate.
- Service providers who help us operate our website, booking system or communications.
- Regulatory authorities where required by law.

Where third-party service providers process personal information on our behalf, we will take appropriate steps to ensure suitable data protection arrangements are in place.

We will not share personal information with other organisations for their own marketing purposes without an appropriate lawful basis.

Photography and Media Consent

Inspire Community Hub CIC may take photographs or videos during sessions, activities and community events to celebrate achievements, share positive experiences and promote our work.

We recognise that individuals have different preferences regarding photography and publicity, and we are committed to respecting their privacy, dignity and personal choices.

We will:

- Explain how photographs and videos may be used, including on our website, social media and promotional materials.
- Seek appropriate consent before publishing identifiable photographs or videos where consent is our lawful basis.
- Obtain consent verbally or in writing and maintain an appropriate record of the permission given.
- Respect individuals who do not wish to be photographed, recorded or featured in promotional materials.
- Ensure that individuals are supported to make their own decisions about photography wherever possible, including those with additional communication or support needs.

- Recognise that carers and support workers cannot automatically provide consent on behalf of another adult.
- Take particular care when photographing children attending community events, obtaining appropriate permission from a parent or person with parental responsibility.
- Avoid publishing sensitive personal information without an appropriate lawful basis.
- Provide individuals with a clear way to raise concerns or withdraw consent.

Inspire Community Hub CIC will maintain a record of photography and media consent, whether provided verbally or in writing. This record will include the individual's name, the date consent was given and what the individual has agreed to, including where photographs or videos may be published. Consent records will be stored securely and treated confidentially.

Where consent is relied upon, individuals may withdraw it at any time by contacting Inspire Community Hub CIC.

Following withdrawal, we will stop further use of the photographs or videos based on that consent and take appropriate steps to remove existing content from platforms and materials under our control.

We recognise that photographs or videos already shared, downloaded or distributed by others may not always be recoverable.

Inspire Community Hub CIC is committed to ensuring that photography and media activities are conducted respectfully, responsibly and in accordance with applicable data protection legislation.

WhatsApp Community

Inspire Community Hub CIC operates a WhatsApp Community to help members stay informed about sessions, activities and announcements.

Participation is voluntary.

Individuals should be aware that their telephone number, profile information and messages may be visible to other members, depending on WhatsApp's features and privacy settings.

We encourage members to respect one another's privacy and not share other people's personal information without permission.

Individuals may leave the WhatsApp Community at any time.

Data Retention

Inspire Community Hub CIC will retain personal information only for as long as necessary for the purpose for which it was collected, taking account of legal requirements and legitimate organisational needs.

Different types of information may require different retention periods, including:

- Booking and attendance records.
- Financial records.
- Volunteer records.
- Accident and incident reports.
- Safeguarding records.
- Photographs and media consent records.

Inspire Community Hub CIC will keep personal information only for as long as it is needed for running our activities, meeting legal requirements or maintaining appropriate records. Information that is no longer required will be securely deleted or disposed of.

Individuals' Data Protection Rights

Under UK data protection legislation, individuals may have the right to:

- Be informed about how their personal information is used.
- Request access to their personal information.
- Request correction of inaccurate information.
- Request deletion of information in certain circumstances.
- Request restriction of processing.
- Object to certain uses of their information.
- Request data portability where applicable.
- Withdraw consent where consent is the lawful basis.

These rights are subject to applicable legal conditions and exemptions.

Requests will be considered promptly and handled within the time limits required by law.

Data Breaches and Incidents

Inspire Community Hub CIC recognises the importance of responding promptly to suspected or actual personal data breaches.

Where a breach occurs, we will:

- Take immediate steps to contain the incident where possible.
- Assess the nature and potential impact of the breach.
- Record relevant details and actions taken.

- Determine whether notification to the Information Commissioner's Office (ICO) is required.
- Notify affected individuals where legally required.
- Review the incident and implement appropriate preventative measures.

Where a breach is reportable to the ICO, notification will normally be made within 72 hours of becoming aware of it, where feasible.

Complaints and Data Protection Enquiries

Anyone with questions or concerns about how Inspire Community Hub CIC handles personal information may contact the organisation directly.

We will take privacy concerns seriously and aim to resolve them promptly and fairly.

Individuals also have the right to raise concerns with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Privacy and Data Protection Enquiries: info@inspirecommunityhub.org

Contact Information

Data Controller: **Inspire Community Hub CIC**

Email: info@inspirecommunityhub.org

Review

This policy will be reviewed annually or sooner if there are significant changes to legislation, organisational activities, technology or the way personal information is processed.

Inspire Community Hub CIC remains committed to protecting personal information and maintaining the trust of everyone involved in our community.

Policy Approval and Authorisation

This policy has been reviewed and approved by the Director of Inspire Community Hub CIC.

Approved by: Kanval Fatima

Position: Director

Date Approved: 8th April 2026

Next Review Date: April 2027

Signature: 

