PRIVACY NOTICE

How Home-Start Cymru collects, uses and protects personal information

Last updated	Next review
20 July 2026	July 2027

Who we are

We know that families trust us with personal and sometimes sensitive information. This notice explains what we collect, why we need it, who we may share it with and the rights you have.

Home-Start Cymru for Families ("Home-Start Cymru", "we", "us" or "our") is a charitable company supporting families with children.

- Registered charity number: **1105577**
- Company number: **05199118**
- Registered office: **11-13 Penhill Road, Cardiff, Wales, CF11 9PQ**
- Email: **info@homestartcymru.org.uk**
- Telephone: **0333 880 0014**

Home-Start Cymru is the **data controller** for the personal information covered by this notice. This means we decide why and how that information is used.

Please contact our Data Protection Lead using the details above if you have questions about this notice or how we use your information.

Who this notice applies to

This notice applies to:

- parents, carers and other adults receiving or seeking our support;
- children and young people whose information forms part of a family record;
- partners and other household members;
- people making or supporting a referral;
- professionals and organisations working with a family; and
- website visitors, enquirers, donors, supporters and event participants.

We provide separate privacy information for employees, applicants, trustees and volunteers because we use their information differently.

You can ask us for this notice in Welsh, in an accessible format or in language suitable for a child or young person.

What information we collect

We only collect information that is relevant and reasonably necessary. Depending on your relationship with us, this may include:

- your name, address, email address, telephone number and date of birth;
- an internal family reference and, where needed for accurate matching, previous names or addresses;
- the names, ages and dates of birth of children and other household members;
- emergency-contact and next-of-kin details;
- information about your family circumstances, relationships and support network;
- records of referrals, assessments, meetings, calls, messages and home visits;
- details of the support we provide and your progress or outcomes;
- details of relevant schools, nurseries, GPs, health visitors and social workers;
- housing, employment, income or financial information where relevant;
- survey responses, feedback, complaints and compliments;
- photographs, recordings or case studies where we have permission or another appropriate legal basis;
- donation, fundraising and event information;
- communication and marketing preferences; and
- website information, including your IP address, browser, device, referring page and pages visited.

We may also need information that receives extra protection under data-protection law. This is called **special-category data** and can include information about:

- physical or mental health;
- disability or special educational needs;
- racial or ethnic origin;
- religion or beliefs;
- sexual orientation or sex life; and
- genetic or biometric information, if relevant.

Information about criminal allegations, investigations or convictions is protected separately. We will only use it where necessary and where the law permits.

We will not collect sensitive information simply to build a "complete picture". Our staff must be able to explain why the information is relevant to the support we provide.

Where information comes from

We may receive information:

- directly from you or another member of your family;
- through a form, email, telephone call, meeting or home visit;
- from the person or organisation making a referral;
- from health visitors, healthcare professionals, schools or nurseries;
- from local authorities, social-care services or other statutory bodies;
- from charities and other support organisations;

- from staff or volunteers supporting your family; and
- automatically when you use our website.

When we receive information about you from someone else, we will normally make you aware of this notice within one month, or earlier if we contact you or share the information.

An exception may apply where telling you would create a safeguarding risk or is prohibited by law.

If you give us information about someone else, please tell them and direct them to this notice unless doing so would be unsafe or inappropriate.

If your family returns to Home-Start Cymru

If your family is re-referred while an earlier record remains within its approved retention period, we will create a new support episode. The earlier episode will remain closed and will not be presented as a record of your current circumstances.

Where relevant to continuity, effective support or safeguarding, we may place a copy of the previous contact log in the new episode. It will be clearly labelled as a historical record and will show the dates and closure date of the previous support episode.

We will complete a new assessment of your current circumstances. Before relying on historical information, we will check relevant details with you where appropriate and identify anything that has changed, is no longer accurate or is disputed. The historical contact log will not be amended or presented as current information.

If the earlier routine family-support record has already been deleted under our Retention Schedule, we will record the referral as a new family-support case. Separately retained safeguarding information will continue to be handled under our Safeguarding Policy and Retention Schedule. Staff and volunteers will only be given the information they need for their role.

Why we use your information

We must have a lawful reason for each way we use personal information.

What we do	Our lawful basis
Respond to enquiries and consider referrals	Our legitimate interests in responding to families and managing our charitable services
Assess families' needs and provide support	Our legitimate interests in providing safe, effective and accountable family support
Use a previous contact log for a re-referral	Our legitimate interests in maintaining continuity, avoiding unnecessary repetition and providing safe and appropriate support
Work with professionals and other support organisations	Our legitimate interests in coordinating appropriate support, or a legal obligation where sharing is required by law
Protect children or adults from harm	Legal obligation, vital interests in an emergency, or our legitimate interests in protecting people
Monitor and improve our services	Our legitimate interests in evaluating our work; consent where taking part is genuinely optional
Deal with complaints, incidents and legal claims	Legal obligation and our legitimate interests in resolving concerns and protecting legal rights
Manage donations, Gift Aid, fundraising and events	Contract, legal obligation and our legitimate interests in administering these activities

What we do	Our lawful basis
Send marketing or fundraising messages	Consent where required; otherwise our legitimate interests where the law allows
Operate, secure and improve our website	Our legitimate interests, together with consent or an applicable cookie exception where required

When we rely on legitimate interests, we consider whether the processing is necessary and whether its effect on you is reasonable. We will not use this basis where your rights and interests override ours.

You do not have to give us information. However, without relevant information, we may be unable to assess a referral or provide safe and suitable support. We will explain this at the time.

Sensitive information and safeguarding

When we use special-category data, we need an additional legal condition. Depending on the circumstances, we may rely on:

- your explicit consent where you have a genuine choice;
- substantial public interest and an applicable condition under the Data Protection Act 2018, including safeguarding children or adults at risk;
- an applicable condition concerning support for people with a disability or medical condition, or counselling;
- vital interests where a person cannot give consent; or
- the establishment, exercise or defence of legal claims.

Where required, we maintain an appropriate policy document explaining how this information is protected and retained.

We do not rely on consent for safeguarding action where asking for consent would be inappropriate, could place someone at risk or could prevent us from acting.

Children's information

Because our work supports families, children's information may form part of a family record. We take particular care to:

- collect only information relevant to the child and the support provided;
- explain what we are doing in language appropriate to the child's age and understanding;
- listen to the child's views where appropriate;
- consider the child's best interests; and
- limit access to people who need the information.

Depending on their age and understanding, children may exercise their own data-protection rights.

A parent or carer may sometimes act for a child, but we must also consider the child's capacity, wishes, confidentiality and best interests.

Who we share information with

We do not sell personal information. Where necessary and lawful, we may share relevant information with:

- staff or volunteers supporting your family;
- the person or organisation that referred you;
- health, education, housing or social-care professionals;
- local authorities and safeguarding partners;
- police, emergency services, courts or regulators;
- charities and other organisations supporting your family;
- commissioners or funders, usually using anonymous or summary information;
- professional advisers, auditors and insurers;
- payment, donation and Gift Aid providers; and
- suppliers providing IT, case-management, website, email, survey or secure-storage services.

We share only the information needed for the particular purpose. Where practical and appropriate, we will discuss sharing with you first.

We may share information without consent where the law requires it, where it is necessary to protect someone from harm or where another lawful basis applies.

Organisations processing information for us must follow our instructions, keep it secure and meet contractual data-protection requirements.

International transfers

Some technology suppliers may store or access information outside the UK.

Where this happens, we use an approved legal safeguard, such as:

- UK adequacy regulations;
- the UK International Data Transfer Agreement;
- the UK Addendum to approved contractual clauses; or
- another safeguard permitted by data-protection law.

You may contact us for information about a particular transfer or safeguard.

How long we keep information

We keep personal information only for as long as it is needed. Our standard periods are:

Record	Retention period
Detailed family referral and support records	12 months from closure of the relevant support episode
Historical contact log used for a re-referral	12 months from closure of the new support episode
Safeguarding records	7 years from the date the safeguarding case is closed, in line with Home-Start Cymru's Safeguarding and Protecting Children Policy
Enquiries that do not lead to support	12 months after the last contact
Complaints and incident records	6 years from closure
Marketing consent records	While consent is being relied upon, then 3 years after withdrawal or the last marketing contact
Marketing objections and opt-outs	A minimal suppression record is retained unless the person later withdraws their objection

Record	Retention period
Donation and financial records	6 years after the end of the relevant financial year or accounting period
Gift Aid declarations	While covering ongoing donations, then at least 6 years after the accounting period containing the final donation
Routine website access logs	3 months
Website analytics containing identifiers	12 months, then deleted or anonymised
Security-event logs	12 months, or 6 years if connected to a breach, investigation or legal claim
Cookie-preference records	12 months after the preference was recorded or replaced
Identifiable survey and evaluation responses	12 months after the evaluation or final report is completed
Anonymous statistics and reports	May be kept indefinitely because they no longer identify anyone

A historical contact log is copied into a new support episode only where it is relevant to continuity, effective support or safeguarding. It is clearly labelled as historical and is not treated as a current assessment. The original contact log keeps its original disposal date.

Safeguarding records may be kept longer where required by law, safeguarding guidance, an investigation, legal proceedings or the nature of the concern.

We may also keep other information longer where there is an unresolved complaint, insurance claim, legal case, audit or regulatory investigation.

When information is no longer needed, we securely delete, destroy or anonymise it.

Our website and cookies

When you use our website, we may collect technical information such as your IP address, browser, device, referring page, pages visited and approximate time or location of access.

We use this information to:

- keep the website secure;
- identify technical problems;
- understand how the website is used; and
- improve its content and accessibility.

Our lawful basis is our legitimate interests in operating, securing and improving the website.

Cookies and similar technologies are also covered by the Privacy and Electronic Communications Regulations. We will:

- obtain consent where required;
- only use a statistical-purpose exception where its legal requirements are met;
- explain which technologies we use and why; and
- provide a simple way to change preferences or object where required.

Our separate Cookie Policy explains which technologies we use, their providers, why we use them and how long they remain active.

Marketing and fundraising

We may contact you about our work, events, campaigns, fundraising or ways to support us.

We obtain consent for electronic marketing where required. Where the law permits, we may use legitimate interests for limited postal or supporter communications.

You can stop marketing at any time by:

- selecting the unsubscribe link in an email; or
- contacting **info@homestartcymru.org.uk**.

Stopping marketing will not prevent us from contacting you about an existing service, donation, safeguarding concern or other non-marketing matter.

How we protect information

We use proportionate measures to protect personal information, including:

- access controls;
- confidentiality and data-protection training;
- secure systems, devices and storage;
- authentication, backups and security monitoring;
- supplier checks and written agreements;
- secure sharing and disposal procedures; and
- a process for managing personal-data breaches.

No system can be guaranteed to be completely secure. We will notify you and the Information Commissioner's Office of a breach where the law requires us to do so.

Your rights

Depending on the circumstances, you may have the right to:

- receive information about how we use your data;
- obtain a copy of your personal information;
- correct inaccurate or incomplete information;
- ask us to delete information;
- ask us to restrict how information is used;
- receive certain information in a portable format;
- object to processing based on legitimate interests;
- object to direct marketing at any time;
- withdraw consent without affecting earlier lawful processing; and
- challenge certain decisions made solely by automated means.

These rights are not absolute. Safeguarding, confidentiality, legal or record-retention requirements may affect what we can provide, change or delete.

To exercise a right, contact **info@homestartcymru.org.uk**. Please describe your request clearly. We may ask for information needed to confirm your identity.

We normally respond within one month. We will explain if we need more time or cannot fully comply.

Your right to object

You have the right to object where we use your information on the basis of legitimate interests. You always have the right to object to direct marketing.

Automated decisions

We do not currently use solely automated systems to make decisions about whether a family can receive support where those decisions would have a legal or similarly significant effect.

If this changes, we will explain how the decision works, how it may affect you and how you can ask for human review.

Questions and complaints

Please contact our Data Protection Lead if you have a question or complaint:

Home-Start Cymru for Families
11-13 Penhill Road
Cardiff
CF11 9PQ

Email: info@homestartcymru.org.uk
Telephone: 0333 880 0014

We will acknowledge a data-protection complaint within 30 days. We will investigate it without undue delay, keep you informed of progress and tell you the outcome when our investigation is complete.

You may also complain to:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113
Website: ico.org.uk/make-a-complaint

Contacting us first does not affect your right to complain to the Information Commissioner's Office.

Changes to this notice

We review this notice regularly and update it when our services, suppliers or use of information changes.

The current version will be available on our website. If a change significantly affects how we use existing information, we will take reasonable steps to tell the people affected before the new use begins.

Signature of Approver: Jonathan Richards
Jonathan Richards (Sep 30, 2026 13:13:26 GMT+1)

Date: 30/09/2026

7c.Home Start Cymru Privacy Notice

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