



## Privacy Notice

Welcome to the Star Fostering Limited Privacy Notice.

Star Fostering Limited respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE

This Privacy Notice aims to give you information about how Star Fostering Limited collects and processes your personal data. It is important that you read this Privacy Notice along with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

#### CONTROLLER

Star Fostering Limited is the controller and is responsible for your personal data and is collectively referred to as “Star Fostering”, “the company”, “we”, “us” or “our” in this Privacy Notice.

We have appointed a Data Protection Lead (“DPL”) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights please contact the DPO using the details set out below:

#### **Star Fostering Limited**

Robert North – Data Protection Lead  
Gothic House  
Barker Gate  
Nottingham  
NG1 1JU  
[finance@starfostering.co.uk](mailto:finance@starfostering.co.uk)  
0115 9671 1099

You also have the right to make a complaint at any time to the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so please contact us in the first instance.

#### **Artificial Intelligence (AI)**



Star Fostering may use authorised Artificial Intelligence (AI) technologies to assist with administrative activities, such as drafting documents, summarising information, improving efficiency and supporting business processes.

AI is **not** used to make decisions based solely on automated processing that produce legal or similarly significant effects on individuals.

Any use of AI involving personal data is subject to appropriate human oversight and is carried out in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and Star Fostering's Artificial Intelligence Policy. Personal information is only processed using AI where there is an appropriate lawful basis and suitable technical and organisational safeguards are in place.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This notice was last updated on 20th July 2026. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **PERSONAL DATA – HOW WE COLLECT IT FROM YOU AND HOW WE USE IT**

### **The people who use our children and young person's services and provide family placement.**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data)

We have collected, used, stored, and transferred, and may collect, use, store, and transfer, different kinds of personal data about you:

We hold personal information about you, which may include your name, date of birth, address, gender, ethnicity, sexual identity and whether you have a disability, so that we can make sure our services meet your needs. We will also record information about the service provided to you, including case reporting, plans and reviews.

## **WHY DO WE COLLECT INFORMATION?**

We are unable to provide you with a service without collecting your data and using your personal data. Under the United Kingdom General Data Protection Regulations ("UKGDPR") we must identify which legal basis we are processing your data. We have identified the following legal bases under which we will collect and process your data:

- Performance of a Contract.
- Public Task.
- Compliance with a legal obligation.



- Legitimate interest.

You should note that we may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis, we are relying on to process your personal data.

## **HOW DO WE USE YOUR DATA?**

We will only use your personal data in a manner in which the law allows us. Most commonly, we will use your personal data in the following circumstances:

- Where we need to in order to perform the contract, we have entered into with you.
- Where we need to in order to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

## **WHO DO WE SHARE YOUR INFORMATION WITH?**

We limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instruction and they are subject to a duty of confidentiality.

We may also share your personal data with the organisation that pays for your service or agencies that inspect our work, such as OFSTED. We may also be required to share your data with other agencies for legal reasons, for example on receipt of a court order. Your data may also be shared with other organisations if we believe that you are at risk of harm or may harm someone else.

On occasion, we may ask for your consent to use your data. For example to help us inform the public of our work. If we do so we will explain exactly what data we wish to use and for what purpose. In this scenario, you are able to withdraw your consent at any time.

## **WHO IS RESPONSIBLE FOR YOUR DATA?**

We are responsible for your data. In some circumstances, relating to specific data, the Local Authority who funds the service being delivered by us could be the Data Controller.

## **HOW LONG DO WE KEEP YOUR DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



On occasion, we are required to transfer your data to the Local Authority that has commissioned us to provide your service, or to another organisation providing you with a service and these organisations will maintain their own retention periods.

## **HOW CAN YOU ACCESS YOUR DATA?**

You may request a copy of the information that we hold about you but sometimes the Local Authority that pays for your service might be responsible for providing you with other data. If that is the case then we will let you know.

### **Job Applicants**

We collect and processes personal data relating to job applicants. If you apply for a role with us, we will only use the information you supply to process your application and to monitor recruitment statistics.

## **WHAT INFORMATION DO WE COLLECT?**

We will collect a range of information about you, including but not limited to:

- Your name, address and contact details, including email address and telephone number.
- Details of your qualifications, skills, experience and employment history.
- Information about your current salary.
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.
- Information about your entitlement to work in the UK.
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief - we will only collect this sensitive information with your explicit consent, which can be withdrawn at any time.

## **HOW DO WE COLLECT YOUR INFORMATION?**

- We collect it in a variety of ways. For example, you may have filled in an application form, or submitted a CV, you may have provided your passport details or other identification documents, or we may have collected it through interviews or other forms of assessment, like online tests.
- We may also collect information about you from third parties, such as references supplied by former employers. Star Fostering will only seek information about you from third parties once we have made you an offer and with your consent. In all cases the application process will make clear at what point we will be contacting third parties.

## **WHERE WILL WE STORE YOUR DATA?**

- Your personal information will be stored, securely, in several places: on your application record, in our recruitment and selection system, our HR management systems and on other IT systems.

## **WHY DO WE NEED YOUR PERSONAL DATA?**



- We need to process your data in order to enter into a working agreement with you. In some cases, we need to process your data to ensure we are complying with our legal obligations, e.g. checking an individual's right to work in the UK.
- We have a legitimate interest in processing your personal data during the recruitment process and for keeping records of the process. It allows us to manage that process, assess and confirm your suitability for the role and decide who to offer a role to. We may also need to process data from job applicants to respond to, and defend against, legal claims. Where we are relying on legitimate interest as a reason for processing data, we have considered whether those interests override the rights and freedoms of the applicant and have concluded that they do not.
- We process health information if we need to make a reasonable adjustment to the recruitment process for the candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.
- For some roles Star Fostering is obliged to seek information about criminal convictions and offences. This is necessary to carry out our obligations and exercise specific rights in relation to employment.
- Star Fostering will not use your personal information for any purpose other than the recruitment exercise for which you have applied.

#### **HOW LONG WILL WE KEEP YOUR DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **WHO HAS ACCESS TO YOUR DATA?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so.

#### **WHAT IF YOU DON'T PROVIDE YOUR INFORMATION?**

- You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide Star Fostering with the information, we may not be able to process your application properly, or at all.
- You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.



### **Our current and former employees.**

Star Fostering collects and processes personal data relating to its staff in order to manage the work relationship with you.

### **WHAT INFORMATION DO WE COLLECT?**

Star Fostering collects and processes a range of information about you that is appropriate to the role you perform with us. This will vary depending on whether you are an employed member of staff, contractor, agency worker or student, and may include:

- Your name, address and contact details, including email address and telephone number, date of birth and gender
- The terms and conditions relating to the work you are doing for Star Fostering
- Details of your qualifications, skills, experience and employment history, including start and end dates with previous employers and with us.
- Information about your salary, including entitlement to benefits such as pensions or death in service insurance cover
- Details of your bank account and national insurance number
- Information about your marital status, next of kin, dependents and emergency contacts
- Information about your nationality and entitlement to work in the UK
- Information about your criminal record
- Relevant information if you drive a fleet vehicle, your own vehicle for business purposes or if we hire a car for you
- Details of your schedule (days of work and working hours) and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and extended leave, and the reasons for the leave
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

### **HOW DO WE COLLECT YOUR INFORMATION?**

- We collect your information in a variety of ways. For example, you may have filled in an application form or submitted a CV; you may have provided your passport details or other identity documents; from forms completed by you at the start or during your work with us; from correspondence with you; or through interviews, meetings or other assessments.
- We may also collect information about you from third parties, such as recruitment agencies, references supplied by former employers, and information from criminal records checks as permitted by law.



## **WHERE WILL WE KEEP YOUR INFORMATION?**

- Your personal information will be stored, securely, in several places: in your personnel file (electronic staff file), in our HR management systems and in other IT systems and email system.

## **WHY DO WE NEED YOUR INFORMATION?**

- Star Fostering needs to process your data to enter into a working relationship with you and to meet our contractual obligations under any agreement with you. For example, if you are an employee we need to process your data to provide you with an employment contract, to pay you in accordance with that contract and to administer any benefits.
- In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is required to check a worker's right to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions it's necessary to carry out criminal records checks to ensure that individuals are permitted to carry out the role in question.
- In other cases, we have a legitimate interest in processing personal data before, during and after the end of the working relationship. Processing staff data allows the organisation to:
- Maintain accurate and up-to-date staff records and contact details (including details of who to contact in the event of an emergency), and records of contractual and statutory rights
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
- Operate and keep a record of employee performance and related processes and workforce management processes
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay and other benefits to which they are entitled
- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that workers are receiving the sick pay or other benefits to which they are entitled
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave) to allow effective workforce management, to ensure that Star Fostering complies with duties in relation to leave entitlement, and to ensure that workers are receiving pay or other benefits to which they are entitled
- Ensure effective general HR and business administration
- Provide references on request for current or former employees
- Respond to and defend against legal claims
- Comply with our statutory and regulatory obligations
- Maintain and promote equality, diversity and inclusion in the workplace
- Where Star Fostering is relying on legitimate interest as a reason for processing employee data, we have considered whether, by collecting the data, the company is overriding the rights and freedoms of our employees and workers and has concluded that we are not.



- Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).
- Information about trade union membership is processed to allow Star Fostering to operate check-off for union subscriptions (where this is processed through payroll).
- Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring.

## **WHO CAN ACCESS YOUR DATA?**

- Your information will be shared with any members of staff for whom access to the data is necessary for the performance of their roles.
- Star Fostering shares your data with third parties in order to obtain pre-employment references from other employers and, if applicable to your role, to obtain necessary criminal records checks from the Disclosure and Barring Service, Disclosure Scotland and Access NI. Star Fostering may also share your data with third parties in the context of TUPE transfers. In those circumstances, the data will be subject to confidentiality arrangements. The services we provide to children and young people are subject to external regulation, so if you work in this service your personal data will be shared with inspectors, and commissioned service data may be shared with the commissioner.
- Star Fostering also shares your data with third parties that process data on our behalf, in connection with payroll, the provision of benefits, and the provision of occupational health services.
- Where personal data is transferred outside the United Kingdom, Star Fostering will ensure that appropriate safeguards are in place in accordance with UK GDPR, including where appropriate the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or an adequacy decision made by the UK Government. Further information is provided in the section "How We Process and Store Your Personal Information."

## **HOW LONG WILL WE KEEP YOUR DATA**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **WORKING WITH THIRD PARTIES**

We will never sell your personal data. However, we may share your information with third parties in order to provide services to you. Your data may be accessible to some of the IT support companies who manage our business critical systems; however, this is only for the purposes of supporting our IT systems and is strictly governed by our contractual arrangements with them. We require all third parties to respect the security of your personal information and to treat it in accordance with the law.



We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Except for these specific cases listed below, we will not share financial information with third parties without your specific consent unless required to do so by law.

We can share your personal information with:

- Selected third parties, including:
  - Business partners, suppliers and subcontractors for the performance of any contract we enter into with them, including:
    - Insurers, solicitors, brokers, loss adjusters, managing agents and landlords
    - Benefits providers and criminal records check processors
    - Website analytics are used only to understand website performance and improve user experience. Analytics information is aggregated wherever possible and is not used to identify individual visitors unless necessary.
  - Where we are under a duty to disclose or share your personal information in order to comply with any legal obligations, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property of star Fostering. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
  - A prospective seller or buyer of our business or assets in the event we sell or buy any such business or assets, including where Star Fostering or substantially all of its assets are acquired by a third party, in which case personal data will be one of the transferred assets.
  - For employees, payroll agencies, HMRC, pension, insurance companies and statutory bodies, where regulated to do so by law.

We will keep your personal information confidential, and where we provide it to other third parties we will only do so under contract, on conditions of confidentiality and security, and only for the purposes for which you have provided your information to us.

### **THIRD PARTY WEBSITES**

Our websites may contain links to third-party websites. This policy only applies to this site, so if you follow a link to a third-party site, please make sure you read the privacy policy on that site. We do not accept any responsibility for third-party sites.

### **HOW DO WE KEEP YOUR DATA SAFE?**

We have put in place appropriate security measures to protect your personal data from accidental loss, unauthorised use or access, alteration or disclosure. Additionally, we limit access to your personal data to those employees, agents, contractors and other third parties



who have a business requirement to know. They will only process your information on our instruction and are subject to a duty of confidentiality.

To help protect personal information, Star Fostering implements appropriate technical and organisational security measures. These include role-based access controls, encryption of personal data where appropriate, multi-factor authentication on supported systems, secure cloud services, regular software and security updates, staff training, and ongoing monitoring of information security arrangements.

We have procedures in place to deal with any suspected personal data breach and will notify you and any relevant regulatory body where we are legally required to do so.

### **HOW WE PROCESS AND STORE YOUR PERSONAL INFORMATION**

Where personal data is transferred outside the United Kingdom, Star Fostering will ensure that appropriate safeguards are in place in accordance with UK GDPR, including where appropriate the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or an adequacy decision made by the UK Government. This includes staff engaged in, among other things, the hosting of the site and the provision of support services. By submitting your personal information, you agree to this transfer, storing or processing. Star Fostering will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this privacy notice.

### **YOUR LEGAL RIGHTS**

Under the United Kingdom General Data Protection Regulation (UKGDPR), you have the following rights:

- a. The right to be informed
- b. The right to access your personal information
- c. The right to edit and update your personal information
- d. The right to request to have your personal information deleted
- e. The right to restrict processing of your personal information
- f. The right to data portability
- g. The right to object - including automated decision making and profiling
- h. The right to lodge a complaint with a supervisory authority

If you wish to exercise your rights, please contact us, providing as much information as possible about the nature of your contact with us to help us locate your records. Once we have received your request, and verified your identity, we will respond within one month.



### **The right to be informed**

You have the right to be informed about the data we hold and share about you. This will be described to you in the service specific information leaflet if you are a service user or through your line manager if you are a member of staff or a volunteer or through our privacy notice above.

### **The right to access your personal information**

You have a right to access your personal data. By making a data subject access request to Star Fostering you can find out what personal data we hold about you, why we hold it and whom we disclose it to

Email: [dpo@starfostering.co.uk](mailto:dpo@starfostering.co.uk)

Alternatively, write to:

Robert North  
Data Protection Lead  
Star Fostering  
Gothic House  
Barker Gate  
Nottingham  
NG1 1JU

### **The right to rectification**

The accuracy of your personal information is important to us. You can edit your personal information including your address and contact details at any time.

### **The right to request to have your personal information deleted**

You have the right to request the deletion of your personal information, which we will review on a case-by-case basis.

### **The right to restrict processing of your personal information**

You have the right to 'block' or suppress processing of your personal data. However, we will continue to store your data but not further process it. We do this by retaining just enough of your personal information so we can ensure that the restriction is respected in the future. Please note, this is not an absolute right and only applies in certain circumstances.

### **The right to data portability**

You have the right to get your personal data from us in a way that is accessible and machine-readable.

### **The right to object - including automated decision making and profiling**



You have the right to object to your personal information being processed for marketing (including profiling) and for research purposes.

### **Your right to lodge a complaint with a supervisory authority**

If you wish to lodge a complaint or seek advice from the supervisory authority, please contact:

The Office of the Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Tel: +44 (0) 01625 545 745

Website: [www.ico.org.uk](http://www.ico.org.uk)

### **R NORTH**

Data Protection Lead

| Policy Management          |                                 |
|----------------------------|---------------------------------|
| <b>Policy Created:</b>     | 1 <sup>st</sup> October 2019    |
| <b>Policy Reviewed:</b>    | 24 <sup>th</sup> November 2019  |
| <b>Policy Reviewed:</b>    | 24 <sup>th</sup> November 2020  |
| <b>Policy Reviewed:</b>    | 24 <sup>th</sup> November 2021  |
| <b>Policy Reviewed:</b>    | 2 <sup>nd</sup> August 2022     |
| <b>Policy Reviewed:</b>    | 1 <sup>st</sup> September 2022  |
| <b>Policy Reviewed:</b>    | 26 <sup>th</sup> September 2023 |
| <b>Policy Reviewed:</b>    | 1 <sup>st</sup> October 2024    |
| <b>Policy Reviewed:</b>    | 28 <sup>th</sup> September 2025 |
| <b>Policy Reviewed:</b>    | 20 <sup>th</sup> July 2026      |
| <b>Policy Reviewed By:</b> | Robert North                    |