



Privacy Policy

- Small Steps SfP is committed to protecting and respecting your data and your privacy. We aim to ensure that any information you give us is held securely and safely. Small Steps SfP strives to follow best practice regarding how we collect, store and use your personal data. We are registered with the Information Commissioner's Office (www.ico.org.uk).
- As you use our service, visit our website, get in touch with us, or take part in our fundraising and activities, we collect information. This enables us to provide our service to our families and improve the quality and relevance of our communications with supporters.
- However you interact with us, we will never share your information with another organisation for their own marketing purposes and we will never sell your information for any reason whatsoever.
- This policy explains how we collect, use and store your personal information. If you have any questions about this policy or how your data is handled, please contact us on 020 8704 593, email: info@smallsteps.org.uk or write to Small Steps, 17-19 Worple Way, Richmond, TW10 6DG.
- This Policy describes how we use your information, protect your privacy and your rights and choices regarding this information.

We collect information in the following ways:

Information you provide us directly:

You may give us information in order to sign up for events, make a donation, purchase our products, register as a volunteer, register as a service user, organise a fundraising event or sign up for our newsletter. When you use our website, we use your personal information using "cookies" and other tracking methods. More details on "Cookies" can be found in our [Cookie Policy](#).

Information you provide to us indirectly

Your information may be shared with us by third-parties such as;

- a) Independent event organisers, for example other fundraising sites like Just Giving or Virgin Money Giving.
- b) If you sign up to donate or fundraise for us through a third-party website such as 'Don'tSendMeACard.com'.

Information from other sources

We may also use information from the following sources;

- a) Social Media - depending on your settings or the privacy policies for social media and messaging services like Facebook, Instagram and Twitter, you might give us permission to access information from those services, for example when you publicly tag the Charity in an event photo.
- b) Information you have given us from other Professionals that work with your child, which is relevant to the service

What sort of personal information do we collect?

We collect store and use the following kinds of personal information:

1. Your name, your contact details (including postal address, telephone number, email or social media identity)
2. Your date of birth or gender.
3. If you volunteer or apply for a job with us, information necessary for us to process your application and access your suitability which may include employment status, previous experience, criminal convictions or pending court cases.
4. Information about events, activities or products which we consider to be of interest to you.
5. Information about your health, medical details if these are needed for insurance purposes for an event you are taking part in.
6. Information as to whether you are a taxpayer to enable us to claim gift aid on a donation.
7. Information about your child if you are a service user, services you may access, medical information and any other information that is relevant for us to be able to register your child for our services.

We will only collect this type of information about our families and supporters if there is a clear reason to do so and make sure we are clear about what this information will be used for.

How we use your information

1. Provide you with the services, products or information you asked for. Administer your donation, or support your fundraising, including processing Gift Aid.
2. Keep a record of your relationship with the Charity.
3. Respond to or fulfil any requests, complaints or queries you make to us; understand how we can improve our services, products or information by using feedback forms or market research.
4. Check for updated contact details to enable us to stay in touch. Send you correspondence and communicate with you.
5. To further our charitable objectives.
6. Process your application for a job or volunteering position.
7. Meet our legal obligations with regards to regulators, government or law enforcement bodies.

How we use your information to tell you about the Charity

1. Sending Marketing Communications:

Our marketing communications include information about our services, fundraising and events by way of e-newsletters, flyers, letter correspondence and email communication. If you sign up for an event with a third party and tell the organiser that you want to fundraise for our Charity, we may contact you with information and support for your fundraising event, if you have given permission for us to do so.

As part of the registration process for our regular e-newsletter, we collect personal information. We use that information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We never rent or trade email lists with other organisations and businesses.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's privacy notice](#).

You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our Marketing and Communications Manager ruth@smallsteps.org.uk.

2. Managing your contact preferences:

We make it easy for you to tell us how you want to communicate, in a way that suits you. We provide forms and other marketing material with clear marketing preference options and we include information on how to unsubscribe. If you decide you do not want to hear from us, we will not contact you again about our Charity. You can also change your communication preferences at any time by contacting us directly at info@smallsteps.org.uk.

Legal basis for processing

Data Protection Law states that our use of personal information must have a legal basis.

- 1. Consent** - is where we ask you if we can use your information in a certain way and you agree to this i.e. when we send you marketing material by post, email. Where we use your information for a purpose, based on consent, you have the right to withdraw consent for future use of your information at any time.
- 2. Legal obligation** - We have a basis to use your personal information where we need to do so to comply with a legal or regulatory obligation. For example, the Charity Commission, Fundraising Regulator.
- 3. Enter into a Contract** - We have a basis to use your personal information where we are entering into a contract with you i.e. purchasing something from us, such as an event place or applying to work or volunteer for us.
- 4. Vital interests** - We have a basis to use your personal information where it is necessary for us to protect life or health. For instance, if there was an emergency impacting individuals at one of our events, or a safeguarding issue, which requires us to contact people or share information with emergency services.
- 5. Legitimate interest** - We have a basis to use your personal information if it is reasonably necessary for us to do so and in our/their "legitimate interests" (provided that what the information is used for is fair and does not unduly impact your rights) We consider legitimate interests to include all of our day-to-day activities we carry out with personal information. This includes use of personal information to review, administer and keep an internal record of the people we work with, including supporters and volunteers. Where you have signed up for a third-party charity event sharing personal information with the third party event organiser so that they can administer the event.

How we keep your information safe

We ensure that there are appropriate technical and organisational controls in place to protect your personal details. Our IT network is password protected and routinely monitored.

How long we keep your information

We have specific criteria to determine how long we will retain your information for, which are determined by legal and operational controls.

Sharing your information with other organisations

We will never sell or pass your information to third party organisations for marketing purposes.

Keeping your information up to date

In order that we can ensure that we are only sending our marketing material to the correct individual, please keep us up-to-date of any changes to your address and advise us if you no longer wish to receive marketing communication from us. Please contact us by phone, email or through our website contact page.

Your rights

Under UK Data Protection law, you have rights over any personal information that we hold for you:

Rights of Access - You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you. If you wish to access your information please contact the Charity with details of what information you would like to see either by email

info@smallsteps.org.uk or in writing to Small Steps, 17-19 Worple Way, Richmond, TW10 6DG.

Rights to have your personal information corrected - You have the right to have incomplete or inaccurate information we hold about you corrected. If you believe the information we hold about you is incorrect, please provide us with details and we will investigate.

Right to restrict use of your personal information

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: If some information we hold on you is not correct, we are not lawfully allowed to use it; you need us to retain your information in order for you to establish or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

Right to erasure of your personal information

You may ask us to delete some, or all of your personal information and in certain cases, and subject to exceptions, you have the right for this to be done.

Right to object to the use of your personal information - If we are processing your personal information based on our legitimate interests, you have a right to object to the use of your information. If you wish to exercise any of the above rights, please contact us by email or post. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt, however if for any reason we are unable to do so, we will contact you with the reasons for the delay.

Consent

Whilst consent is not required to process most data, it is usually required to process sensitive personal data and is normally required to send direct marketing by email or SMS.

Visitors to our website

When someone visits www.smallsteps.org.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. For more information on how Google Analytics processes this information, visit www.google.com/analytics/. You can find more information on how cookies are used on our website in our [Cookies Policy](#).

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Complaints and Suggestions

If you are unhappy with any aspects of how we are using your personal information or have any questions, comments or suggestions, please let us know by contacting the charity at: 020 8704 5935, email: info@smallsteps.org.uk or write to Small Steps, 17-19 Worple Way, Richmond, TW10 6DG.

Monitoring and review of the policy

This policy is reviewed annually to ensure that it is achieving its objectives.

Last updated: 4th December 2019

Small Steps SFP

17-19 Worple Way, Richmond, TW10 6DG

Company Registration No 8353635 | Registered in England and Wales | Registered Charity No 1150651

Tel: 020 8704 5935 Email: info@smallsteps.org.uk www.smallsteps.org.uk