

Consortium of Voluntary Adoption Agencies UK Ltd

Privacy Policy

Purpose and scope of this policy

This privacy policy relates to CVAA external communications. The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of users, the CVAA website and other external communication platforms. The processes, storage and protection of user data and information is detailed within this policy.

This policy applies to all members of staff, trustees, contractors, suppliers or other people working on behalf of CVAA as well as users of CVAA services. It also applies to children and adopters whose data CVAA processes.

The CVAA website

Staff and contractors are required to take a proactive approach to user privacy in all work undertaken on the CVAA website and ensure the necessary steps are taken to protect the privacy of its users. The website complies with all UK national laws and requirements for user privacy.

Use of cookies

This website uses cookies to improve user experience while visiting the website. Where applicable the website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with legislative requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website.

Users are advised that if they wish to deny the use and saving of cookies from the CVAA website on to their computers hard drive they should take necessary steps within their web browser's security settings to block all cookies from the website and its external serving vendors.

The CVAA website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to the user's computer hard drive in order to track and monitor engagement and usage of the website, but will not store, save or collect personal information. Google's privacy policy provides further information [<http://www.google.com/privacy.html>].

Contact & communication

Users contacting the CVAA website do so at their own discretion and provide any such personal details requested at their own risk. Personal information is requested for a particular purpose, kept private and stored securely until a time it is no longer required, as detailed in the Data Protection Policy. Every effort is made to ensure a safe and secure form-to-email submission process but CVAA advises users using our form-to-email processes that they do so at their own risk.

Information submitted via the website is used to provide further information about the products/services CVAA offers or assist in answering any questions or queries submitted. This includes using details to subscribe users to email newsletters and Practice Programme updates if express permission was granted when submitting booking or other forms via email or through the website. No details are passed on to any third parties.

Email newsletter

Email newsletters and marketing information to inform subscribers about events and services may be delivered via the CVAA website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreement with the user.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 1998. No personal details are passed on to third parties. Under the Data Protection Act 1998 any person may request a copy of personal information held about them by CVAA. Such requests will be responded to within 14 working days of receipt.

CVAA email marketing campaigns may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity (this is not a comprehensive list). This information is used to refine future email campaigns and supply users with more relevant content, based around their activity.

In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to unsubscribe at any time through an automated system. This process is detailed at the footer of each email correspondence. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

External links

Although the CVAA website and newsletters only include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links. (External links are clickable text / banner / image links to other websites)

CVAA cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users click on external links at their own risk and CVAA cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social media platforms

CVAA communication, engagement and actions taken through external social media platforms are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Staff are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. CVAA does ask for personal details or sensitive information to be shared through social media platforms and encourage member agencies and individuals wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email.

The CVAA website may use social sharing buttons which help share web content directly from web pages to our social media platforms. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save requests to share a web page through the social media platform account.

Shortened links in social media

The CVAA website and social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy URLs [web addresses] such as: <http://bit.ly/2wDtsSn>.

Staff and website users are advised to be cautious before clicking any shortened URLs published on the CVAA website and social media platforms. Despite best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore CVAA cannot be held liable for any damages or implications caused by visiting any shortened links.

The CRM

The type of personal information we collect

CVAA's CRM collects and processes the following information:

- User's name, surname, email, job title, name of organisation
- Events attended
- Notes (interests in different topics)

How we get the personal information and why we have it

For all Users we collect Personal Data when they voluntarily provide such information to CVAA when they register for access to CVAA practice events. The Personal Data collect includes their name, email address and any other information that enables Users to be personally identified such as their job title and the name of the organisation they work for. This is explained on the webpage at the point of booking.

This data is used to ensure participants receive all relevant pre and post event materials, evaluation surveys and links to reports and presentations from the event. These details are also used to target information about future events which may be of interest to the participant.

We keep the information for 5 years to evidence that Users have attended CVAA's CPD events. We also keep the information to identify User's training needs.

We collect and use the Personal Data we collect in a manner that is consistent with this Privacy Policy, and applicable privacy laws.

If Users wish to be removed from the CRM, they can contact CVAA at info@cvaa.org.uk and they will be removed immediately.

The data on the CRM is held securely with access by authorised staff only and is never shared with any third party.

The CVAA data project

The type of personal information we collect:

CVAA processes data on behalf of its members. The data it handles is personal data relating to adopted children and prospective adopters/adopters. It includes data such as:

- Child/adopter dates of birth
- Ethnicity, religion and disability information
- Key dates for children and adopters throughout the adoption process.

CVAA does **not** process data containing names, addresses or contact details of children or adopters.

How we get information and why we have it

The personal information we process is provided to us from our members (voluntary adoption agencies). All members have been provided with specific data protection advice relating to sharing this data with us, including how to inform children and adopters about the information they share with us.

We use the anonymised information that members have given us in order to generate statistics and analyse trends in adoption, which we share with our members and sometimes government and other decision-makers to influence adoption policy. The purpose is to improve the way that the adoption system works for children, families and adopters.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is for statistical purposes. More information about processing for statistical purposes can be found [here](#) on the Information Commissioner’s Office (ICO) website.

We keep child and adopter data for 5 years in order to help us analyse trends over a robust time period. We will delete all data from beyond 5 years permanently from our IT system.

Subject access requests

All individuals who are the subject of personal data held by CVAA are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations.

This request from an individual is called a subject access request.

Subject access requests from individuals should be made in writing. Emails should be addressed to the Communications and Business Support Officer at cvaamembershipservices@cvaa.org.uk. Letters should be addressed to:

CVAA
 Gregory House
 Coram Campus
 41 Brunswick Square
 London
 WC1N 1AZ

The Communications and Business Support Officer will always verify the identity of anyone making a subject access request before handing over any information.

Subject access requests may be subject to an administrative charge.

Other data access requests

Organisations, partners, or individuals not directly involved in the running of CVAA who request data, such as adoption agencies or academic institutions, must provide information covering proof of identity, the use, handling, storage, and disposal of, the requested data. CVAA will approve all data requests on an individual basis.

Disclosing data for other reasons

There are a small number of circumstances when CVAA will share data with third parties, when it is necessary for the running of the organisation. For example, sharing employee information with specific member agencies and contracted organisations which manage CVAA’s business functions, including HR, payroll, and IT.

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, CVAA will disclose the requested data. The CEO will ensure the request is legitimate seeking assistance from the Board and from CVAA's legal advisers where necessary.

If data is shared with CVAA by third parties which has not been requested and is not required by CVAA it will be deleted/destroyed.

Requesting deletion of data

The right to get your data deleted is also known as the 'right to erasure'. You have a right to ask CVAA to delete your personal data, which CVAA will consider. This [ICO page](#) has more information about how to request deletion of data and when we should comply with this request.

Resources & further information

- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [Twitter Privacy Policy](#)
- [Google Privacy Policy](#)
- [Mailchimp Privacy Policy](#)