

Consortium of Voluntary Adoption Agencies UK

Privacy Policy

1. Purpose and scope of this policy

This privacy policy explains how we use any personal information we collect about you through our work at CVAA. The policy sets out the different areas where user privacy is concerned and outlines the measures that CVAA takes to protect your personal information, in line with UK data protection law. This includes providing information about the processes, storage and protection of user data.

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

2. Key legislation and regulations

This policy has been developed in line with UK data protection law and regulations as follows:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations (PECR)

Where we use third party platforms – such as MailChimp, SurveyMonkey, Google and so on – please refer to their individual Privacy Policies detailed on their websites.

3. What information we collect about you

We collect information in a number of ways, for example when you:

- Register for a website account
- Contact us via email

- Sign up for our newsletter
- Register for an event via our website
- Complete surveys or provide feedback

This information may include:

- Name, role and organisation
- Contact details such as email address
- Information about prior interaction with us, such as events attended
- Information provided via email correspondence

We also collect information on your website usage through cookies (further information provided below).

4. How we use your information

We collect information about you to fulfil the requirements we have towards our member and subscriber organisations, to process orders and provide you with relevant information.

We also use your information to help us develop what we offer as an organisation, such as training and services. Where we have a lawful basis and permission to contact you, we may share information with you about what CVAA offers.

5. Where we store your information

5.1. The CVAA website and CRM

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.

CVAA's CRM collects and processes the following information, which includes personal data which is voluntarily provided when registering for services including training:

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

This is inputted via the CVAA website and explained on the webpage at the point of booking.

We process this data under the following lawful bases:

- **Legitimate interests** – to manage event participation and communications
- **Consent** – where you opt in to receive marketing communications

Where we rely on legitimate interests, we ensure this is balanced against your rights and interests.

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. It is also used to target information about future events which may be of interest to the participant.

We collect and use the Personal Data we collect in a manner that is consistent with this Privacy Policy, and applicable privacy laws. The data on the CRM is held securely with access by authorised staff only and is never shared with any third party.

5.2. Email correspondence

Users may email CVAA with queries or to request further information about CVAA and its services.

Any personal information provided or requested will be 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.

5.3. Newsletters

Email newsletters and marketing information to inform Users about updates, events and services may be delivered via the CVAA website or a third party provider. CVAA currently uses Microsoft Outlook and Mailchimp to manage its regular newsletters and updates. Users can subscribe through an online automated process or can be added manually to distribution lists upon written request.

Subscriptions are taken and stored in compliance with UK data protection law and regulations.

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 legislation and regulations, 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.

5.4. Surveys

We use SurveyMonkey to design, deliver, and analyse surveys to help us improve our training and services. This may involve processing personal information such as names, contact details, and

responses. Data collected through surveys is used for evaluation and service improvement and is handled in accordance with UK data protection law.

6. The CVAA data project

6.1. 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.

We recognise that children's data requires a higher level of protection and ensure appropriate safeguards are applied.

6.2 How we get information and why we have it

The personal information we process is provided to us from our members (voluntary adoption agencies). We request that all members send this information to us via encrypted platforms such as Egress and store information securely on our internal system. 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.

We process this data under the following lawful bases:

- Public task (performing a task in the public interest)
- Statistical/research purposes.

More information about lawful bases and processing for statistical purposes can be found [here](#) and [here](#) on the Information Commissioner's Office (ICO) website.

7. How long we keep your data

We only keep personal data for as long as necessary for the purposes we collected it for, including meeting legal, accounting, or reporting requirements.

Specific retention periods include:

- Event/CRM data: 5 years (time period enables CVAA to evidence that Users have attended CVAA's CPD events and to identify user training needs)
- Child and adopter data: 5 years (time period enables CVAA to analyse trends over a robust time period)

After this period, data is securely deleted or anonymised.

If Users wish for their data to be removed, they can contact CVAA at info@cvaa.org.uk and they will be removed immediately.

8. Use of cookies

Our website uses cookies to improve user experience and understand how the site is used. Some cookies (such as those used for essential functionality or limited statistical purposes) may be used without consent where permitted under UK law. Where consent is required, we use a cookie control system that allows users to accept or reject non-essential cookies.

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>].

9. 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, including clickable text / banner / image links to other websites.

10. 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 take due care and caution in regard to their own privacy and personal details. CVAA encourages 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 to note that the social media platform may track and save requests to share a web page through the social media platform account.

11. 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.

12. Automated decision-making

CVAA does not carry out solely automated decision-making that produces legal or similarly significant effects on individuals. If this changes, we will update this policy and ensure appropriate safeguards are in place, including the right to human review.

13. Your data protection rights

- Under UK data protection law, you have the right to:
- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data (right to erasure)
- Request restriction of processing
- Object to processing (including direct marketing)
- Request transfer of your data (data portability)
- Request human review of any automated decision-making

You can exercise these rights by contacting us at info@cvaa.org.uk.

14. 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 info@cvaa.org.uk.

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.

15. 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.

17. Disclosing data for other reasons

There are a small number of circumstances when CVAA will share data with **trusted** 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. Where we share data, we ensure appropriate contracts and safeguards are in place. We do not sell or trade personal data.

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.

18. 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.

19. Complaints process

If you have concerns about how CVAA handles your personal data, you have the right to complain directly to us. Please contact CVAA CEO Satwinder Sandhu via info@cvaa.org.uk, and we will acknowledge and respond to your complaint within a reasonable timeframe.

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/>