



**SPECIAL NEEDS  
COMMUNITY**

Community Interest Company, Reg. No. 11123977

*Supporting, Empowering and Connecting Families*

## **Privacy and Data Protection Policy**

At Special Needs Community (SNC CIC, we are committed to protecting your privacy. Whenever you share personal data with us we aim to be clear with you, and not to do anything with your data that you wouldn't reasonably expect us to do.

We will never sell your personal data to other organisations and will only ever share it in appropriate, legal or exceptional circumstances.

We will only send e-newsletter and marketing communications to those that have explicitly stated that they are happy for us to do so via their preferred channel(s) (e.g. email, SMS, phone) or where we have a legitimate interest reason for doing so. These communications include information about SNC's services supporting families with disabled children (including information from our group of websites within the SNC brand, or from reputable organisations, local council or health departments we work with that are of importance or use to families), and offers and information about how you can become involved, including fundraising, campaigning and volunteering.

Our fundraising is legal, open, honest and respectful.

**If you would like to receive communications but have not opted in, please contact us on**

**07838 317730 or email at [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk)**

This privacy notice covers the following points:

- 1. What type of information we collect and where from**
- 2. How we use the information collected**
- 3. Legal basis & legitimate interests**
- 4. Who we share your information with**
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## 1. What type of information do we collect and where from?

When you give it to us directly

We may ask for personal information about you, including your name, date of birth, email address, postal address, telephone number, the local authority that you live in and demographic information such as ethnicity and gender.

Times when we would do this include when you ask about our activities, take part in our activities, sign up for e-newsletters/bulletins, tell us your story, take part in our research, call our helpline, order products or services, make a donation, fundraise on our behalf or complete an online survey. This includes information that you may have provided to organisations or council/health departments that refer you to us (always and only with your permission) for information, support, and products and services.

In some circumstances, such as when you are referred to us, from another organisation, we may ask about your children, including their ages, names, disability or medical condition (especially in accordance with the terms and conditions of the purchase of a Max Card), other people in your household, the type of education your child receives and your housing costs. You will always have the option to "prefer not to say".

You may also provide personal information directly to us when you get in touch with our helpline by email or through social media. We collect this data to understand who we are helping with each service and if there are groups of families with disabled children that we are not reaching.

Occasionally, it may be useful for us to find out why you are supporting us as this helps us understand the benefits of our work. You do not have to answer this question and we only want you to answer if you are happy doing so.

When you give it to us indirectly

Your information may be shared with us by fundraising sites like Crowdfunder, Easyfundraising, Justgiving or Virgin Money giving. These independent third parties will only do this if you've indicated you're happy for them to do so. You should check their privacy policy when you provide your information to understand fully how they will process your data.

We may get your information via a referral from a third party, such as another charity or local authority/health department, but they must ask for your consent before sharing that information with us and we will seek confirmation that they have done so.

When we collect it as you use our websites or applications

For all web visitors we use Google Analytics to collect cookies - standard information that your browser sends to every website you visit - such as your IP address, browser type and language, access times and referring website addresses. We use cookies on the website for our own internal purposes, to track how users navigate through the website and therefore how to improve our online services.

It is possible to prevent your web browser from accepting cookies from our website, and details of how to change your local settings can be found in your web browser. However, please be advised that where you choose to prevent cookies, it is possible that core features of our website will not work and you may experience limited functionality from the website. To find out more about

cookies, including details of cookies and how to manage and delete them, please visit the [All About Cookies website. \(https://www.allaboutcookies.org/\)](https://www.allaboutcookies.org/)

Where you have accessed our group of websites via a third party website, your web browser may have already accepted a cookie. Whilst we are unable to accept any responsibility for these third party cookies (as they are not promoted or created by us nor are they under our control), we would recommend that you review the privacy policy or cookie policy for any search engines or websites that have linked you to our website. This is so that you may fully understand the privacy policies they currently have in place.

When you make a purchase/booking through our online and Paypal payment or EventBrite platform.

When you purchase items or bookings from our online shop, as part of the shopping process we will collect personal information from you. This information allows us to process the order and inform you of any product changes, order delays or other issues as they arise.

When you provide us with your personal details as part of the order transaction, we will assume that you consent to us using and collecting this information in order to complete your purchase (and for this reason only). We are also required to retain your details for accounting purchases as proof of purchase. We also use your purchase information to answer queries or resolve disputes with your order.

If you are requesting a referral for made to measure products or specialised items we will request your permission to pass on your contact details on to the supplier or service if appropriate.

Please note: information may be disclosed to Max Card if we are legally obliged to do so as the licensed distributor. We may also provide information to the necessary HMRC/Inland Revenue department as part of our accounting obligations.

Our online shop is hosted by Paypal/EventBrite who enable us to provide product solutions to you via our e-commerce platform. Your data is therefore stored on Paypal/EventBrite data storage system and Paypal/EventBrite application via a secure server and firewall.

## Social media platforms

We use third party providers of social media platforms (Facebook, Twitter, Instagram, YouTube, Mighty Networks) to monitor and manage our social media interactions. These services are governed by the privacy policies of these platforms. For more information, please visit their individual sites.

If you post on SNC's social media pages and online community, mention SNC on social media platforms or send us a private or direct message via social media, we will assume you give permission for us to respond. Messages posted on our social media pages are available publicly and we can't take responsibility for those messages, which are subject to the privacy policies of the application provider and the specific privacy account settings of the user.

We may use messages posted on SNC's social media pages to better understand our audiences, supporters and their concerns. As part of this, we may, anonymise and aggregate information that users post on our social media pages and community pages. This information may then be published as a study or shared with partners. This will only be done in line with the privacy policies

and terms and conditions of those platforms. If we seek to use attributable quotes from people using our social media channels, we will always seek their permission first.

## 2. How we use the information collected

We use your personal information to:

- Provide you with the services, products or information you asked for.
- Administer and acknowledge your donation or support your fundraising, including processing gift aid.
- Keep a record of your contact and relationship with us.
- Keep you informed about our work.
- Understand more about our current supporters and identify or seek support from new potential supporters.
- Ensure we know how you prefer to be contacted.
- Understand how we can improve our services, products or information. For example, data on the services you access will be used anonymously and in aggregation with other user data to report back to our funders about the number of people reached and services delivered and to carry out research.

We may contact you about our services and the work that we do either because you have said you would like to hear from us or because we believe we have a legitimate interest in doing so. We are committed to only contacting you about things that you would expect us to contact you about. This can include our work, activities, campaigns and how to support us. We include information on how to opt-out in all direct marketing that you receive.

Information about the services you have accessed, including advice you have received from us, may be kept as a record of your contact with us where it is in our legitimate interest to do so, for instance to provide you with a better service if you get in touch again. This may include information you have given us in the course of receiving advice, such as about your child's age and disability.

We may combine information you provide to us with information available from publicly-available sources to create a directory of information on our directory website.

We also use publicly-available sources to carry out due diligence on donors in line with our Gift Acceptance Policy and meet money laundering regulations.

Developing a better understanding of our supporters through your personal data means we can make better decisions, fundraise more efficiently and, ultimately, support families with disabled children more effectively.

### People receiving newsletters and other communications from us

SNC issues a range of materials for supporters and subscribers for distribution, both electronically by email and in hard copy by post, and we may also seek to promote our services by phone and text message. We will only contact you with such material by each channel if you have asked us to do so or where we believe you would reasonably expect us to.

We might use personal information you have provided to us to select which communications you receive, or to tailor our communications to you. This may include:

- Your contact details (e.g. formal titles or professional details you share with us - and from which we may derive gender; email address information; post code, etc).
- Any connection to SNC, you may have shared with us if you have given us permission to use in this way.
- Other preferences expressing interest in particular aspects of our work and activities

We will always use this information with care and consideration. If you'd like to change how we communicate with you, or would like us to remove your details, please call 07838 317730 or email [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk).

## **What you'll receive when you opt into our latest news and updates**

When we invite you to opt into our communications, we will offer you a choice of communications channels (email; phone; SMS; post) and ask you what you'd like to hear about. These options are explained below.

### **a) News updates from SNC**

We'll send you our regular e-newsletter.

Our newsletters are intended to give you a look at all aspects of our work, including on occasion our fundraising and campaigning activities. However, we will never send you direct appeals or emails specifically dedicated to those topics unless you've subscribed to our other updates (see below).

Alongside our regular newsletters, we will occasionally send you other news updates that we think might be of interest to you.

### **b) News and offers from our online shop**

We'll send you a dedicated newsletter with the online shop, where you can find toys, clothing & sensory products for disabled children.

### **c) Fundraising updates**

We'll send you opportunities to take part in our fundraising events, tips and suggestions of ways you can support us, and appeals in which you can make a financial contribution to our work if you'd like to.

### **d) Campaigning updates**

We'll send you opportunities to contribute to campaigning work, including by signing petitions, contacting your MP or local authority, or becoming a media case study to bring to life the important issues we're fighting.

### **e) Updates about parent carer participation**

We'll send you key information about supporting parent carer forums, including updates about health, special education and social care in England, news for local forums, Department for Education grant information, forum success stories, the latest news from the NNPCF and opportunities for forums to participate and shape policy and legislation.

### **Communication by email**

We may use email to give updates about or to ask for feedback on our services, in respect of an entry for an event and to thank our supporters. Our helpline will sometimes email people back with additional information or to confirm a call-back appointment with a parent adviser where you have agreed to a call-back appointment. Similarly, if you are receiving support from one of our family workers, they may email in relation to your appointment or with additional information.

### **Communication by post**

If you receive information by post from our helpline, we will never use your address to send you information unless we have your explicit consent to do so. We send magazines, publications, event information and invitations and fundraising materials by post to people who have asked to receive post from us. All such communications include details on how to stop receiving these in future by phoning, emailing or writing to us.

### **Communication by phone**

We only phone people who have consented to hear from us by phone, and this may be to give updates about or to ask for feedback on our services, in respect of an entry for an event and to thank our supporters. The helpline will sometimes phone people back with additional information, or to confirm a call back appointment with a parent adviser. All these appointments are by telephone and call back appointments are only made with the agreement of the individual. Similarly, if you are receiving support from one of our family workers, they may telephone in relation to your appointment or with additional information.

### **People donating money to SNC**

If you donate money to SNC we will record your personal details, which enable us to process your donation (for example if made by credit card or direct debit) and to claim Gift Aid where relevant. This may include some or all of your: name, address, telephone number, email, amount of donation, reason for donation, bank details, if you are a tax payer for Gift Aid purposes. We may contact you using these details in respect of your donation (for example to send an acknowledgement or receipt, to give notice of direct debit collection).

### **People who order SNC resources**

A range of advice and fundraising resources are available to order and are detailed on our website. If you order any of these resources we will collect information from you necessary for fulfilment of that order including mailing to you, emailing to you and phoning you. Fulfilment may be carried out on our behalf by third-parties to whom we would pass your details for that purpose only. Such arrangements are governed by appropriate contracts with clauses included to protect your data. We will not use your details for other purposes unless you have given separate permission for us to do so.

### 3. Legal basis & legitimate interests

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law.

One of these is where we have obtained your specific consent to use your information for a previously notified purpose, such as to send you email/text marketing or to provide you with a product, service or information at your request.

Another is where we have a legal obligation to use or disclose information about you - for instance, where we are ordered by a court or regulatory authority or we are legally required to hold donor transaction details for Gift Aid or accounting/tax purposes.

In certain instances, we may collect and use personal information where this is necessary in our legitimate interest as a charity. This includes being able to:

- Send direct marketing material to supporters by post or contacting them by telephone for fundraising purposes (subject to checking against the Telephone Preference Service and any existing marketing preferences)
- Conduct research to better understand who our supporters are and better target our services, campaigning and fundraising activity
- Monitor who we deal with to protect our charity against fraud, money laundering and other risks

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this policy. We would also not intrude on your privacy or previously expressed marketing preferences.

Where we process sensitive personal data we will make sure that we only do so in accordance with one of the additional lawful grounds for processing such as where we have your explicit consent or you have made that information manifestly public. When we do this, we will tell you what sensitive personal data we are collecting and why.

### 4. Who we share your information with

We will not sell your details to any third parties, but we may sometimes share your information with people or organisations who are authorised to act on SNC's behalf. For example, we may share your information with people or organisations who:

- Process payments on our behalf.
- Administer activities on our behalf (for instance if we subcontract a consultant or associate to deliver a service on our behalf).
- Supply us with technology to provide you with a service, and/or to process your data safely and in accordance with your wishes (for example database solutions; email marketing tools; our website's chat functionality).
- Provide research and insight services to support fundraising.
- Update addresses to ensure any post we send goes to the correct and up-to-date address.

In all of these instances, we remain the data controller. The protection of your data will be covered by written agreements with any person or organisation who acts on our behalf, ensuring that they treat your data in a safe and legal way.

In addition we may exchange your personal information with other organisations for the purposes of fraud and credit risk reduction. In these circumstances we always require strict compliance from these organisations and require that your personal information is not used for their own business and marketing purposes.

There are a few exceptional situations where we may have to breach confidentiality and pass on your details without your consent.

Situations where we might need to break confidentiality:

- A child is at risk of harm.
- A vulnerable adult is at risk of harm.
- You are at serious risk of immediate harm.
- A terrorist threat has been made.
- We have been ordered to share information with the courts.
- A person poses a serious risk to others.

If a decision is made to break confidentiality, we will make reasonable effort to keep you informed of what we intend to do. We will only ever share your data in circumstances outside of this if we have explicit and informed consent.

## 5. How we keep your data safe

SNC is responsible for collecting your personal information. We use rigorous procedures when we collect your personal information in order to prevent unauthorised access.

No data transmission over the internet is 100% secure and although we try to protect your personal information, SNC cannot guarantee the security of any information you transmit to us and you do so at your own risk.

We have appropriate technical controls in place to protect your personal details. We ensure that your information is only accessible by appropriately trained staff, volunteers and contractors with whom we have contracts that are compliant with data protection regulations.

## 6. How you can access and update your personal information

If you would like to update the information that we have on our records, please email [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk).

You have a right to ask us to stop processing your personal data, to restrict how we process your data or to delete your data, and if it's not necessary for legal reasons or for the purpose you provided it to us for (e.g. processing your donation or registering you for an event) we will do so. Contact us on 07838 317730 or [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk) if you have any concerns.

*Please note there are consequences with your purchase with the Max Card as you will not be able to renew it or we will not be able to answer any purchase queries.*

You have a right to request access to any information we hold about you.

If you wish to access your information, please contact us at [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk), and we will ask you to complete a subject access request form in order to confirm your identity if necessary and to provide you with the data you need.

If there are any discrepancies in the information we provide, please let us know and we will correct them.

For further information, we recommend reading the [Information Commissioner's guidance](#).

If you have any concerns with the way your personal information has been handled, you can [contact the ICO](#).

## 7. Visitors to our website

### Payment

If you are asked for, and provide, details of a credit, debit or charge card; in that event, you must ensure that (a) you are fully entitled to use that card, and (b) it has available funds sufficient to cover the charges which are deducted from it. As part of the payment process, you will receive a verification e-mail, the purpose of which is to take reasonable steps to ensure that the e-mail address you have nominated during payment is controlled by you.

## 8. Online community

If you use the online community you must comply with these terms and conditions.

Although you must read these terms and conditions in full, the most important points to remember are:

- You must be 18 or over to use the community.
- We will only **pass on your details without your consent** if you or someone else is at risk of serious harm.
- Please don't use the community for advertising, research or fundraising.
- The site is moderated within working hours, Monday to Friday. We do not pre-approve posts and rely on community members to help flag posts that breach the guidelines.

### Membership to the online community

People who register for the community become 'members'. They must be at least 18 years of age.

Members of this service may:

- Post their details on the community
- Receive emailed messages, which will be sent to the email address you specified during registration or any subsequently notified update
- Opt to receive other notifications
- Send messages and write posts to other community members

### Registration

You undertake to register using accurate and current information about yourself and your family.

## SNC Members/community role

Although we do our best to moderate the community, we are not and cannot be responsible for the behaviour of members. You should be aware that we do not pre-screen or monitor the material contributed by members.

## Operation of services

SNC reserves the right to withdraw or modify one or more aspects of the community, or the entirety of it, where we have legal or commercial reasons to do so. There may also be times when the community becomes inaccessible as a result of technical difficulties. We will, however, use reasonable skill and care to overcome these difficulties where they are within our control. For security or other reasons, we may require you to change password or other information which facilitates access to the community.

## Misuse of the community

Members must not post anything that is abusive, offensive, discriminates against another family's ethnic background, culture, religion, age, sex, sexuality, class, disability or political beliefs.

We reserve the right:

- To suspend or terminate any member's access to the community, or parts of it, and/or
- To edit, or require the member to edit, material posted on the community, if the relevant member or material appears to us to be in breach of any provision of this agreement or the community guidelines

Any person whose access has been suspended or terminated must not re-register for, or re-access, the community without our prior consent. You are responsible for everything that is done on or through the community while your membership account is logged on or through your email addresses.

## Relevance and prohibitions

The community is intended to be used by its members for the purposes referred to above. Members must not:

- Place material on, or otherwise use, the community for any business or commercial purpose
- Use your access to the community or information gathered from it, for the sending of unsolicited bulk email (sometimes known as spam)

You are responsible for ensuring that no material you post, or which is posted through a machine on which you access the community, nor any activity or communication you make in connection with any Contact service, will be capable of

- Infringing the intellectual property or other rights of any person or entity
- Breaching any applicable law, whether criminal, tortious or otherwise
- Appearing to be offensive, threatening, obscene, pornographic, false, unreliable or misleading.

## Alerting Contact

If you see anything on the community which appears to infringe this agreement, then please contact us by emailing us.

## Withdrawal of material and termination of membership

Although membership is free to parent carers, each member acknowledges that we are entitled to withdraw any material on the community that appears to be capable of breaching any part of this agreement, or to bring the community into disrepute.

However, each user acknowledges that we do not pre approve material which appears on the community and that we are reliant upon you and all users to notify us of anything you see here which appears likely to breach this agreement.

## Online community disclaimer and release

We have no control over or responsibility for the truth or accuracy of any material available on the community, whether provided by members or others. If any third party sites are linked to from the community, this does not mean that we endorse or have any responsibility for the site in question or anything that appears on it.

You should exercise no lesser degree of caution in appraising what you see on the community than you do off-line.

Even though members are prohibited from doing so, people may provide information, or otherwise behave, in a way that is unreliable, misleading or even illegal. Further, you should note that people may not necessarily be who they say they are.

Your use of the community is entirely at your own risk.

Accordingly, to the extent that the law permits, you release to SNC, its directors, contractors and employees from all liability arising out of or in connection with the community and the material included here by members and other third parties.

## Fees

This service is currently provided free of charge. However, we may add new or ancillary services from time to time that require the payment of fees - either to us or a nominated third party - on terms that will be provided to you at the time.

## Intellectual property

You acknowledge that all copyright, trademarks, and other intellectual property rights in and relating to the community (including the material which is contributed by members) are owned by SNC.

No one may copy, distribute, show in public or create any derivative work from the community, or any of the material which is found on the community unless properly licensed to do so by us.

By submitting any material to the content to the community you:

- Are representing that you are fully entitled to do so
- Grant us a non-exclusive, royalty-free, non-terminable licence right to copy, modify, distribute, show in public and create derivative works from that material in any form, anywhere, and
- Authorise us to adapt the relevant material in the course of doing so, and so waive your moral rights to object to any derogatory treatment, or to be identified as the author, of the material in question

#### 9. How long we keep data for

We keep your personal information only for as long as required to operate the service in accordance with legal requirements and tax and accounting rules. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

#### 10. How we handle children's data

We never use children's data for marketing purposes. None of our services or the support we offer to parents is reliant on children's data being shared with us. We use the data to ensure that we give the best possible support to the parent. We also use data on children for our own research purposes and to ensure that the services we offer are as effective as they can be in supporting parents.

#### 11. Changes to the policy

We review this policy annually and may update it from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.

If you have any queries about this policy, please contact us on [info@specialneedscommunity.org.uk](mailto:info@specialneedscommunity.org.uk).

*Last updated: June 2020*