Close-Knit Families Privacy Policy

Signed and approved by the Board of Trustees

Last Review Date: 16th November 2026

Next Review Date: November 2027

Contents

1. About us 3
2. Who this policy covers 3
3. What information we collect 3
Information you give us 3
Information we collect automatically 3
Information we receive from other people 4
Special category and criminal offence information 4
Information about children 4
4. How we use your information and our legal basis 4
5. Newsletters and marketing 5
6. Who we share your information with 5
7. Where your information is stored 6
8. How we keep your information secure 6
9. How long we keep your information 6
10. Your rights 7
11. Cookies 7
12. Other websites 7
13. Complaints 8
14. Changes to this policy 8
Document control 8

1. About us

Close-Knit Families ("Close-Knit", "we", "us") supports people to help give babies the best start in life. We are a charitable incorporated organisation registered in England and Wales (Charity Number 1210105). Our registered address is St Aidan's Centre, Clifton Street, Middlesbrough TS1 4BZ.

We are the **data controller** for the personal information described in this policy. This means we decide how and why it is used, and we are responsible for looking after it. We are registered with the Information Commission's Office (ICO), registration reference ZB897608

Jonny Munby is the named GDPR and Data Protection Lead.

If you have any questions about this policy or how we use your information, contact us at **info@close-knit.org.uk** or write to us at the address above.

We take your privacy seriously. This policy explains what personal information we collect, why we collect it, the legal basis we rely on, who we share it with, how long we keep it and what your rights are. It is written to meet the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended by the Data (Use and Access) Act 2025.

2. Who this policy covers

This policy applies to personal information about:

- parents, carers and families who use our services, courses, groups and events
- visitors to our website and social media pages
- people who sign up to our newsletter or other updates
- supporters, donors and partners
- volunteers, staff, trustees and job or volunteer applicants

Staff and volunteers may also receive a separate, more detailed privacy notice covering their employment or volunteering.

3. What information we collect

Information you give us

You may give us information when you fill in a form on our website or at an event, book onto a course or group, sign up for updates, make a donation, apply to work or volunteer with us, take part in a survey, or contact us by phone, email, letter or social media. This may include:

- your name, postal address, email address and phone number
- details about you and your family that are relevant to the support we provide, such as your baby's name, age or due date
- feedback, survey responses and evaluation information
- payment details when you pay for a course or make a donation (these are processed securely by our payment providers and we do not store full card details)
- photographs or video, where you have agreed to this

Information we collect automatically

When you visit our website we may collect technical information such as your IP address, browser type and version, device and operating system, and information about how you use the site (pages visited, time spent on pages and how you arrived). Section 11 explains how we use cookies to do this.

Information we receive from other people

We may receive information about you from:

- health visitors, midwives, children's centres or other professionals who refer you to us (with your agreement)
- partner organisations we deliver services with
- fundraising platforms and payment providers, such as when you donate through them
- referees and the Disclosure and Barring Service (DBS), for staff and volunteer recruitment

Special category and criminal offence information

Some information is treated as more sensitive under data protection law. We only collect it where we need it and we protect it carefully. This may include:

- health information you choose to share with us about you, your pregnancy or your baby, so that we can support you safely
- health information about staff and volunteers, for example to make reasonable adjustments or manage sickness absence
- equality monitoring information (such as ethnicity or disability), which is always optional and used in anonymised form for reporting
- criminal record information from DBS checks for roles that require them

Information about children

Our services are for parents and carers. We may hold limited information about babies and children that parents give us (for example a name or date of birth). We do not knowingly allow children under 13 to sign up for online services or our newsletter.

4. How we use your information and our legal basis

Data protection law says we must have a valid legal reason (a "lawful basis") for using personal information. The table below sets out the main ways we use information and the basis we rely on.

For a full list, contact us at info@close-knit.org.uk.

Purpose	Examples	Lawful basis
Providing our services, courses, groups and events	Bookings, reminders, delivering sessions, follow-up	Contract (where you have booked or paid) or legitimate interests (running our charitable services)
Understanding your needs and supporting you safely	Health or family information you share with us	Legitimate interests or contract, plus your explicit consent for health information
Safeguarding	Recording and, where necessary, sharing concerns about the safety of a child or adult	Legal obligation and the recognised legitimate interest of safeguarding vulnerable people; for sensitive data, the safeguarding condition in the Data Protection Act 2018
Newsletter and updates	News about our work, events, volunteering and fundraising	Consent, or the charitable purpose soft opt-in (see section 5)
Donations and fundraising	Processing donations, thanking you, Gift Aid claims	Contract, legal obligation (Gift Aid and accounting records) and legitimate interests

Purpose	Examples	Lawful basis
Research, monitoring and evaluation	Surveys and feedback to measure our impact and report to funders	Legitimate interests; reports to funders are anonymised
Running and improving our website	Fixing problems, security, understanding how the site is used	Legitimate interests; consent for non-essential cookies (see section 11)
Recruiting and managing staff and volunteers	Applications, references, contracts, payroll, training	Contract and legal obligation
DBS checks	Checks for roles working with children or vulnerable adults	Legal obligation and legitimate interests, under the employment and safeguarding conditions in the Data Protection Act 2018
Photographs and stories	Using images or case studies in our publicity	Consent, which you can withdraw at any time

Where we rely on **legitimate interests**, we have considered whether our interests are balanced against your rights and expectations. You can ask us for more detail about this. Where we rely on **consent**, you can withdraw it at any time by contacting us, and this will not affect anything we did before you withdrew it.

If we want to use your information for a new purpose, we will check it is compatible with the reason we collected it, or we will ask for your consent where needed. We do not make decisions about you using purely automated means.

5. Newsletters and marketing

We will only send you our newsletter or other electronic updates (emails or texts) where:

- you have given us your consent; or
- you gave us your contact details when you expressed an interest in our work, used our services or offered us support, and we gave you a simple way to say no at that time. This is known as the **charitable purpose soft opt-in**. We will only use it to send messages that further our charitable purposes, such as news about our services, events, volunteering and fundraising.

We will not use the soft opt-in where contacting you could cause harm or would not be appropriate given how you came into contact with us.

Every message we send includes a simple way to unsubscribe. You can also opt out at any time by emailing info@close-knit.org.uk . We never sell or swap your details with other organisations for their marketing.

6. Who we share your information with

Only Close-Knit staff, trustees and authorised volunteers who need to see your information can access it. We may share information with:

- **service providers** who process data on our behalf, such as our website host, email newsletter platform (e.g. MailerLite), booking system (EventBrite) payment and fundraising providers (e.g. Stripe, Stewardship), IT and cloud storage providers (e.g. Microsoft 365 /

Google Workspace) and our payroll provider. They may only use your information on our instructions and must keep it secure

- **partner organisations** we deliver services with, where you have agreed or where it is needed to provide your support
- **funders**, but only in anonymised or summary form unless you have agreed otherwise
- **HMRC** for Gift Aid claims, and our accountants or independent examiner
- **the DBS** and any umbrella body we use to process DBS checks
- **police, children's social care or other authorities** where we are required by law, or where we need to share information to protect a child or adult from harm

We never sell your personal information.

7. Where your information is stored

Most of the information we hold is stored in the UK. Some of our service providers may store or process data outside the UK. Where this happens, we make sure the transfer is lawful and your information is protected, for example by using countries the UK Government has approved as providing adequate protection, or by using contracts approved for this purpose (such as the UK International Data Transfer Agreement or Addendum). You can contact us for more information about these safeguards.

8. How we keep your information secure

- computers and accounts that hold personal data are password protected, and we use multi-factor authentication where available
- laptops, phones and other portable devices that hold personal data are encrypted
- paper records containing personal information (other than basic names and contact details) are kept on secure premises in locked cupboards or filing cabinets
- staff and volunteers who handle personal data receive data protection training
- we have a process for dealing with any data breach, and we will report serious breaches to the ICO and tell you where the law requires us to

No method of sending information over the internet is completely secure. We will do our best to protect your information, but you send it to us at your own risk. Once we receive it, we use appropriate security measures to protect it.

9. How long we keep your information

We keep personal information only for as long as we need it for the purpose we collected it for, or for as long as the law requires. Our main retention periods are:

Type of information	How long we keep it
Newsletter and mailing list details	Until you unsubscribe or withdraw consent, and reviewed every 2 years for inactive contacts
Service, course and event records	3 years after your last contact with us
Donation and Gift Aid records	6 years after the end of the financial year they relate to
Safeguarding records	In line with our Safeguarding Policy and statutory guidance, which may be longer
Staff and volunteer records	6 years after the person leaves
Unsuccessful job or volunteer applications	6 months after the recruitment decision

Type of information	How long we keep it
DBS certificate information	We record the outcome, date and reference number only, and do not keep copies of certificates for longer than 6 months
Website analytics data	14 months, or the setting used in Google Analytics

Where we hold information on the basis of your consent, we keep it only for as long as we have your consent. Our full retention schedule is available on request.

10. Your rights

You have the following rights over your personal information:

- **Access**: to ask for a copy of the information we hold about you. We will respond within one month, or within three months for complex or multiple requests (we will tell you if we need longer). We will carry out a reasonable and proportionate search for your information
- **Rectification**: to have inaccurate or incomplete information corrected
- **Erasure**: to ask us to delete your information, unless we need to keep it by law or for another valid reason
- **Restriction**: to ask us to limit how we use your information in certain circumstances
- **Objection**: to object to us using your information where we rely on legitimate interests, and to object at any time to direct marketing
- **Portability**: to ask for information you gave us to be provided in a commonly used electronic format, where we process it on the basis of consent or contract
- **Withdraw consent**: where we rely on your consent, you can withdraw it at any time

To use any of these rights, contact us at info@close-knit.org.uk . We may need to confirm your identity before we respond. There is normally no charge. More information about your rights is available on the ICO website at https://ico.org.uk .

11. Cookies

Cookies are small files placed on your device when you visit a website. We use:

- **strictly necessary cookies**, which the website needs to work properly and securely, and which remember your choices (for example your cookie preferences). These do not need your consent
- **analytics cookies** from Google Analytics, a service provided by Google, which help us understand how many people visit our site and which pages they use, so we can improve it. Google may use this data for its own purposes, so we only set these cookies if you agree to them through our cookie banner

You can accept, reject or change your cookie choices through the cookie settings link at the bottom of our homepage when you access our website, or by changing your browser settings. If you block all cookies, some parts of our website may not work properly. For more about how Google uses data, see Google's privacy policy.

12. Other websites

Our website may link to other websites, including our partners and funders. These sites have their own privacy and cookie policies, and we are not responsible for them. Please read their policies before you give them any personal information.

13. Complaints

If you are unhappy with how we have handled your personal information, please contact us first at info@close-knit.org.uk or by post at the address in section 1. You can complain by any method, including by phone or in person. We will acknowledge your complaint within 30 days, look into it without undue delay, keep you updated and tell you the outcome.

If you are not satisfied with our response, you have the right to complain to the Information Commission's Office (ICO), the UK data protection regulator:

- Website: https://ico.org.uk/make-a-complaint
- Helpline: 0303 123 1113
- Post: Information Commission's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

14. Changes to this policy

We review this policy every year, and whenever the law or the way we use personal information changes. Any updates will be posted on this page and, where appropriate, we will let you know by email.

Document control

Item	Detail
Document reference	Policies/GDPRWebsitePrivacyPolicy2627
Approved by	Jonathan Munby
Date approved	16/11/2026
Last reviewed	November 2026
Next review	November 2027
Signature	