

The Congregation of the Little Sisters of the Poor

Privacy Policy

The purpose of this Privacy Policy, is to give a clear explanation about how the Little Sisters of the Poor collects, stores and uses your personal information, and how we protect your privacy, rights and choices when doing so.

The Little Sisters use personal information on a daily basis in accordance with the law, to deliver our services and help build and maintain relationships with residents, family members, donors, associates, volunteers, event attendees, suppliers, community groups and organisations.

Our use of personal information allows us to; deliver our care services, develop a better understanding of our supporter community, make more informed decisions, fundraise more efficiently and, ultimately, help support vulnerable older people throughout the UK.

Who we are

The Little Sisters of the Poor is a charity, registered in England and Wales with the Charity Commission (charity number: 234434).

We specialise in supporting vulnerable older people of modest means, by meeting their needs in providing safe accommodation, emergency assessment, respite provision, and palliative end of life care.

The Little Sisters Mission has always been to care for the elderly poor, in a spirit of humble service, and we strive to challenge ageism and disadvantage to ensure the neediest are included in society and can lead fuller, more independent lives.

Our care homes use a relationship-centred care approach, and the impact of our work brings many benefits; particularly by reducing loneliness and isolation and keeping people active. Other notable impacts are achieved by building partnerships with schools and other groups, supporting people to form friendships, and bringing communities together to create lasting change.

Our contact details

Little Sisters of the Poor
St Peter's Residence
2a Meadow Road

This Privacy Policy came into effect on 04/06/2020 and will be reviewed on 04/06/2021.
It was approved by the charity's Board of Trustees on 03/06/2020.

London
SW8 1QH

Our Data Protection Officer can be contacted as per details below:

Tel: 020 7735 0788

Email: dpo@lsplondon.co.uk

Website: www.littlesistersofthepoor.co.uk

How we collect information about you

You may provide your information directly for one or more of the following reasons;

- In relation to receiving care
- In relation to employment
- To identify as a family member in relation to a relative's care
- To register or participate in an event
- To make a donation
- To purchase a raffle ticket or participate in a competition
- To register as a volunteer
- To make an enquiry or Subject Access Request
- To receive news and information about the charity
- To follow the charity on social media

When you use our website, we collect your personal information using 'cookies'. You can access the Little Sisters of the Poor Cookies Policy directly from our website. You can choose to reject any cookies (other than those that are essential for our websites use) by clicking on the 'Privacy and Cookies Policy' link on our website.

Your information may also be provided indirectly through the following channels;

- Shared with us by third parties (where you have given permission), for example;
 - Where a friend or family member signs you up for one of our events
 - Professional fundraising agencies (e.g. independent event organisers such as the London Marathon or fundraising sites like Just Giving or Go Fund Me etc.)
 - Where you register as a volunteer for us through a Job Centre or external volunteering website
- We may receive data about you from third parties acting on our behalf who provide us with technical, payment or delivery services, and without whom we could not deliver our services
- We may receive data about you from business partners, advertising networks and search/analytics providers used on our website where you have provided consent

This Privacy Policy came into effect on 04/06/2020 and will be reviewed on 04/06/2021.
It was approved by the charity's Board of Trustees on 03/06/2020.

You should always check any privacy policy provided to you where you give your data to a third party.

The type of personal information we collect

We currently collect and process the following information:

- Personal information, including health data that is required to deliver care to our residents. This information is required to deliver our contractual obligations and in the vital interests of our residents
- Personal identifiers, contacts and characteristics e.g. name and contact details (including postal address, email address, telephone number(s), and social media usernames where these have been provided by you through an opt-in mechanism or we believe that we have a legitimate interest in holding your details - either because you are a resident, family member or friend of a resident and / or someone who has donated to our charity in the last three years)
- Personal information that is required in the course of your employment. This is required for the purpose of an employment contract; to comply with the law; or in the legitimate interest of Little Sisters of the Poor or our employees (for example, holding bank account details in order to pay our employees)
- Donation records, including the donation amount(s), method of payment, date of receipt, which fundraising appeal(s) the donation(s) relate to, and Gift Aid declaration. This information is legally required for audit purposes and any Gift Aid reclaims
- Information that is necessary for us to maintain our relationship with our Associates. This information may be required for us to comply with our legal obligations, in the legitimate interest of Associates and Little Sisters of the Poor, or because consent has been provided
- Information necessary to help us process applications for volunteering opportunities, and assess suitability e.g. employment status, previous experience relating to role, CRB checks if necessary, any unspent criminal convictions or pending court cases. This information is required for us to comply with legal obligations, in our mutual legitimate interest or because consent has been provided
- Other personal information that has been provided with your consent, such as your gender, nationality, ethnicity, date of birth, bank details, employer and work address, mailing preferences, reason(s) for your interest in our charity. This information will help the charity to administer donations, communicate with you in appropriate ways and help us to comply with data protection legislation.

Certain types of personal information are in a special category under data protection laws, as they are considered to be more sensitive e.g. information about health, race, religious

beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information.

The Little Sisters only collect this type of information about our residents, employees, volunteers, Associates or supporters if there is a clear reason for us to do so e.g. health and safety information for certain sponsored events, to help us provide appropriate facilities or support etc.

We will make clear why we are collecting this type of information, identify a lawful basis, and provide a separate condition for processing to outline what it will be used for.

How we use your information

We will use your personal information:

- To provide care to our residents
- To provide other health professionals with health related information where this is a necessary part of providing care
- To provide you with the services, information or opportunities you have requested
- To provide information about our aims and objectives, work, fundraising appeals, activities, volunteering, news or events, based on your consent given
- To process donations we may receive from you
- To fundraise in a manner referred to in this Policy or that you would reasonably expect (please also see our Ethical Code of Conduct)
- To create an individual database account for you if you register with us
- To deliver products or services to you
- To process orders and payments for our shops or in-house competitions
- For administration purposes e.g. to follow-up an enquiry you have made, stewardship following a donation, news on an event you have registered for etc.
- For internal management, such as reporting and record keeping of relationship with the charity, enquiries made, feedback or complaints etc.
- To invite you to participate in voluntary surveys or research, to help the Little Sisters improve our services, products or information
- To analyse and improve the online services we offer, to make them as user-friendly as possible. This includes analysing our website to troubleshoot, perform data analysis, research, rectify any errors with online submissions etc.
- To process applications for use of services, a job or volunteering position
- Where collecting and holding your information is required or authorised by law e.g. to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies
- Where required by law, we may use external specialist agencies for the purposes of credit risk reduction, fraud prevention money laundering checks

This Privacy Policy came into effect on 04/06/2020 and will be reviewed on 04/06/2021.
It was approved by the charity's Board of Trustees on 03/06/2020.

- Safeguard our residents, staff and volunteers
- Conduct due diligence and ethical screening
- Audit and administer our accounts
- Establish, defend or enforce legal claims
- Other specific purposes that you may agree to from time to time

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) We have a contractual obligation
- (b) We have a legal obligation
- (c) We have a vital interest
- (d) We need it to perform a public task
- (e) We have a legitimate interest
- (f) You have provided consent

Little Sisters of the Poor will never share or sell your personal data with a third party for marketing purposes. The only people with access to your personal data will be nominated and trained Data Controllers and people nominated and trained by them who need to access the data in order to fulfil their management functions, including finance and fundraising staff.

How we store your personal information

The Little Sisters of the Poor use appropriate technical and organisational controls, to protect your personal details and ensure information is stored safely. Our online forms and data storage are encrypted, our network is protected and routinely monitored, and we only keep your personal information for as long as is necessary (i.e. for the purposes set out in this Policy and in accordance with guidance issued by relevant regulatory authorities).

We regularly review the personal information and records that we hold, and delete what is no longer required. We never store payment card data after the transaction has been completed, and other personal information no longer needed is securely disposed of and/or anonymised.

(Please note - some personal information may be archived for statistical or historical reporting purposes, however this will be done in a manner that complies with applicable data protection law).

Your information will be stored within the European Economic Area. In circumstances where our suppliers operate outside the European Economic Area in countries not subject to the same data protection laws as companies based in the UK, the Little Sisters of the Poor will

take steps to ensure appropriate safeguards are in place and we provide an adequate level of protection in accordance with UK data protection law.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact us:

Data Protection Officer
Little Sisters of the Poor
St Peter's Residence
2a Meadow Road
London
SW8 1QH

Tel: 020 7735 0788

Email: dpo@lsplondon.co.uk

Complaints procedure

If you have any concerns about our use of your personal information, please contact us immediately at;

Data Protection Officer
Little Sisters of the Poor
St Peter's Residence
2a Meadow Road
London
SW8 1QH

Tel: 020 7735 0788

Email: dpo@lsplondon.co.uk

Website: www.littlesistersofthepoor.co.uk

The Little Sisters of the Poor charity is registered with the Fundraising Regulator, the independent regulator of charitable fundraising in England, Wales and Northern Ireland.

The Fundraising Regulator works in partnership with other regulators and the representative bodies in the charitable and fundraising sectors, to stand up for best practice in fundraising, to build public confidence, ensure consistent fundraising standards, protect donors and support the vital work of fundraisers across the UK.

The Fundraising Regulator investigate complaints about fundraising where these cannot be resolved by the organisations themselves. Please visit www.fundraisingregulator.org.uk/more-from-us/resources/complaints-process for more information on their complaints process.

You can also direct your complaint to the ICO if you are unhappy with how we have used your data;

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>