



Policy Name	Safeguarding Vulnerable Users (Children)
Policy Group	Safeguarding
Signed off by	SMCA Board
Signed off date	10 th December 2024
Next review date	December 2025

Safeguarding Vulnerable Users (Children) Policy

1. Introduction

The purpose of this policy statement is to define how South Mitcham Community Association operates to safeguard children in order to:

- protect children from harm.
- provide staff and volunteers with the overarching principles that guide our approach to safeguarding.

SMCA is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and London Borough of Merton’s Safeguarding Partnership requirements. SMCA recognises that it has responsibilities for the safety and care of children under the Children Act 1989 and 2004. The organisation will act in accordance with the Domestic Abuse Act 2021 and all relevant legislation. The organisation also recognises and meets its responsibilities under Working Together 2023.

2. Definitions

- A child is anyone up until their 18th birthday.
- “Safeguarding and promoting the welfare of children” is defined in Working Together 2023 as:
 - providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children’s mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.
- Staff: For the purpose of this policy covers both paid staff and volunteers.
- Safeguarding arrangements consider young people aged 16–18 transitioning to adult services. Collaboration with the vulnerable adult safeguarding policy will ensure continuity of care.

3. Persons affected

This policy applies to everyone working/ volunteering on behalf of SMCA, including the board of trustees, paid staff, volunteers, sessional workers, agency staff and students

4. Safeguarding policy

SMCA is committed to the importance of safeguarding and promoting the welfare of children. It has:

- a clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children;
- a senior board level lead to take leadership responsibility for SMCA’s safeguarding arrangements;
- a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;
- clear whistleblowing procedures and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;
- arrangements which set out clearly the processes for sharing information procedures with other professionals and with the London Borough of Merton’s safeguarding Partnership;
- a designated professional lead for safeguarding at SMCA. Their role is to support other professionals in their agencies to recognise the needs of children, including rescue from possible abuse or neglect. Designated professional roles should always be explicitly defined in job descriptions. Safeguarding leads should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively;
- safe recruitment practices for individuals working with children, requiring enhanced DBS checks, including a check against the Children’s Barred List (previously known as List 99);
- appropriate supervision and support for staff, including undertaking safeguarding training;

- ensuring that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- staff receive a mandatory induction, which includes familiarisation with safeguarding responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare;
- staff receive at least Level 1 safeguarding training upon induction;
 - safeguarding training will be updated every two years, unless there is a change in legislation, a safeguarding issue arises, or a staff member's role changes, necessitating additional training (e.g., Level 2 or DSL training);
 - all staff should have regular reviews of their own practice to ensure they improve over time in their work with children, young people and families;
- clear policies and procedures in line with the Local Authority Designated Officer (LADO) procedures for dealing with allegations against people who work/ volunteer with a child/ren. They will make a clear distinction between an allegation, a concern about the quality of care or practice or a complaint. An allegation may relate to a person who works/volunteers with children who has:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- acknowledged that children have the right to be listened to, to have their concerns taken seriously, and to be supported throughout safeguarding processes.

SMCA is committed to empowering children and their families by supporting informed decision-making. Proportionality will guide responses to safeguarding concerns, ensuring that interventions are appropriate to the level of risk.

5. SMCA will ensure that staff understand;

- What they need to do, and what they can expect of one another, to safeguard children.
- Core legal requirements, making it clear what individuals and SMCA should do to keep children safe. In doing so, SMCA seeks to emphasise that effective safeguarding systems are those where:
- The child's needs are paramount, and the needs and wishes of each child, be they a baby or infant, or an older child, should be put first, so that every child receives the support they need before a problem escalates;
- That all staff who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children;
- The requirement to share appropriate information in a timely way and can discuss any concerns about an individual child with colleagues and local authority children's social care;
- The necessity to use their expert judgement to put the child's needs at the heart of the safeguarding system so that the right solution can be found for each individual child;

- The necessity to contribute to whatever actions are needed to safeguard and promote a child's welfare and take part in regularly reviewing the outcomes for the child against specific plans and outcomes;
- The unique risks posed by online services and acknowledge risks such as cyberbullying, grooming, and exposure to harmful content.

Handling Accusations or Disclosures: Guidelines for Staff Members

In the event that a staff member is approached with an accusation or disclosure, it is essential to handle the situation with care and professionalism. These guidelines provide a framework for staff members who may not have previous experience in such situations:

Stay Calm and Listen:

Do:

Remain calm and composed.

Listen attentively without interrupting.

Show empathy and understanding.

Don't:

Display shock, disbelief, or judgment.

Interrupt or ask probing questions.

Take the Disclosure Seriously:

Do:

Take all disclosures seriously, regardless of the nature of the accusation.

Reassure the individual that their concerns are being taken seriously.

Maintain Confidentiality:

Do:

Keep the information confidential, sharing it only with relevant authorities or designated personnel.

Don't:

Discuss the details with anyone who does not need to know.

Provide Support:

Do:

Offer support and provide information on available resources.

Encourage the individual to seek professional help if necessary.

Document the Disclosure:

Do:

Write down the details of the disclosure as soon as possible, using the individual's own words.

Include the date, time, and any other relevant information.

Report to the Appropriate Authorities:

Do:

Follow the organization's reporting procedures.

Inform the designated safeguarding officer or other relevant authorities.

Don't:

Delay reporting, even if unsure about the validity of the disclosure.

Follow Up:

Do:

Ensure the individual receives the support they need.

Follow up to check on their well-being.

6. Key principles

Key principles will be communicated that;

- safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part; and a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children;
- the community has a critical role in preventing, detecting, and reporting neglect and abuse. SMCA will engage community stakeholders to strengthen safeguarding efforts.

SMCA is committed to ensuring that safeguarding information is shared effectively with its users. This includes:

- Displaying safeguarding procedures prominently in the community centre, such as through digital displays and simple posters.
- Providing accessible and age-appropriate safeguarding information for children, ensuring they understand their rights and how to report concerns.

7. Designated Safeguarding Lead (DSL)

The DSL is responsible for overseeing child safeguarding practices, providing guidance and support, and acting as the main point of contact for safeguarding concerns. This role will include liaising with local safeguarding boards and statutory authorities. The DSL will have sufficient time, resources, and supervision to fulfil their responsibilities effectively.

1. Designated Safeguarding Lead – Sarah Grand
sarah@smca.org.uk
020 8648 3740
07521 777 794
2. Designated Safeguarding Lead (Deputy) - Izabel Wocial
izabel@smca.org.uk
020 8648 3740
07521 777 792
3. Designated Safeguarding Lead – Board of Trustees – Marc Clifford
marc@smca.org.uk
07511 211 429

8. SMCA's Whistleblowing Policy

SMCA's Whistleblowing Policy is a key component in keeping our people safe from harm, by enabling them to alert the Board to serious issues they aren't or do not feel able to raise through normal procedures. As such it is readily available to all staff. It is included in our Employee Handbook, is covered during induction, and included in safeguarding training, including that for volunteers, sessional workers and activity leaders.

Simple A4 posters with key elements of the whistleblowing policy will be prominently displayed around the community centre, alongside safeguarding information for children and adults.

9. Online Safeguarding Procedures

We will identify and manage online risks by ensuring:

- Volunteers, staff and trustees understand how to keep themselves safe online e.g., by using high privacy settings and password access to information to support this.
- The online services we provide are suitable for our users. For example, using appropriate age restrictions and offering password protection to help keep people safe
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow [GDPR legislation](#).
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns.

10. Policy Review

This policy will be reviewed annually by the Board of Trustees to ensure compliance with current legislation and best practices. Interim reviews may be conducted if significant changes in legislation or safeguarding practice occur.



Policy Name	Safeguarding Vulnerable Users (Adults)
Policy Group	Safeguarding
Signed off by	Marc Clifford, Chair of the Board of Trustees
Signed off date	10 December 2024
Next review date	10 December 2025
Date first implemented	June 2021

Safeguarding Vulnerable Users (Adults) Policy

1. Introduction

We believe that:

- Nobody who is involved in our work or activities should ever experience abuse, harm, neglect or exploitation.
- We all have a responsibility to promote the welfare of all our beneficiaries, staff, volunteers, sessional workers, activity leaders and community centre users to keep them safe and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which people not only feel safe, but also able to speak up, if they have any concerns.

2. Aim of Policy

Our charitable activities include working with vulnerable people. The purpose of this safeguarding policy is to:

- protect and support vulnerable adults and by ensuring that all staff and volunteers promote the wellbeing of our community centre users and respond effectively if concerns are raised or observed.
- provide stakeholders and the public with the overarching principles that guide our approach in doing so.

3. Scope and Responsibilities

This safeguarding policy applies to anyone working on SMCA's behalf, including members of staff, our charity trustees and other volunteers, agency/temporary staff and sessional workers and activity leaders.

Partner organisations will be required to have their own safeguarding procedures that must, as a minimum, meet the standards outlined below, and include any additional legal or regulatory requirements specific to their work.

4. Definition

A vulnerable user is a person who may be unable to take care of themselves or protect themselves from harm or from being exploited.

5. Key Principles for Safeguarding Vulnerable Users

In the safeguarding of vulnerable users SMCA are guided by the principles set out in The Care Act 2014. We aim to demonstrate and promote these principles in our work:

- **Empowerment** – People should be supported and encouraged to make their own decisions and give informed consent;
- **Prevention** – It is better to take action before harm occurs;
- **Proportionality** – Consider the least intrusive response appropriate to the risk presented;
- **Protection** – Support and representation for those in greatest need;
- **Partnership** – Local solutions through services working with their community;
- **The Community** - has a part to play in preventing, detecting and reporting neglect and abuse;
- **Accountability** – Accountability and transparency in delivering safeguarding.

This policy aligns with statutory responsibilities outlined in the Care Act 2014, and where relevant, with the Children Act 1989 and 2004 and Working Together to Safeguard Children 2023, particularly for individuals aged 16–18 transitioning to adult services.

Recognising the signs of abuse

The characteristics of abuse can take several forms and cause individuals to suffer pain, fear and distress reaching well beyond the time of the actual incident(s). Individuals may be too afraid or embarrassed to raise any complaint. They may be reluctant to discuss their concerns with other people or unsure who to trust or approach with their worries.

Types of abuse include, but are not limited to:

- Financial abuse: Exploitation, theft, or fraud.
- Domestic abuse: Physical, emotional, or sexual abuse by a partner or family member.
- Self-neglect: Failing to care for one's own basic needs.
- Psychological abuse: Emotional harm caused by threats, humiliation, or intimidation.

Adults must be supported to make their own decisions. Safeguarding responses will respect individual autonomy and aim to balance protection with the right to choose. There may be some situations where individuals are unaware that they are being abused or have difficulty in communicating this information to others.

Staff/volunteers may be particularly well-placed to spot abuse and neglect. The vulnerable user may say or do things that hint that all is not well. It may come in the form of a complaint, or an expression of concern. Everyone within the organisation should understand what to do, and where to go locally to get help, support and advice. It is vital that everyone within the organisation is vigilant on behalf of those unable to protect themselves, including:

- Knowing about different types of abuse and neglect and their signs;
- Supporting vulnerable users to keep safe;
- Knowing who to tell about suspected abuse or neglect; and
- Supporting vulnerable users to think and weigh up the risks and benefits of different options when exercising choice and control.

6. Rights of Vulnerable Users

Vulnerable users have the right to:

- be made aware of this policy;
- have alleged incidents recognised and taken seriously;
- receive fair and respectful treatment throughout;
- be involved in any process as appropriate;
- receive information about the outcome.

Safeguarding procedures must be communicated clearly to users of SMCA's services. Information about safeguarding will be prominently displayed within the community centre and, where appropriate, shared online.

7. Charity Trustee Safeguarding Responsibilities

Charity trustees have a collective responsibility to lead the organisation in way that makes everyone feels safe and able to speak up. Trustees' responsibilities in relation to safeguarding should be made clear and individuals provided with any necessary training and resources to enable them to carry out their role.

Safeguarding responsibilities should be reflected in job descriptions, the organisation's annual plan and appraisal objectives, reports to the trustee board and other procedures, as necessary.

Trustees will review this safeguarding policy will be reviewed and approved by the Board annually.

A lead trustee will be given responsibility for the oversight of all aspects of safety, including whistleblowing and H&S. This will include:

- Creating a culture of respect, in which everyone feels safe and able to speak up if they have any concerns.
- An annual review of safety, with recommendations to the Board.

- Receiving regular reports, to ensure this and related policies are being applied consistently.
- Providing oversight of any lapses in safeguarding.
- Ensuring that any issues are properly investigated and dealt with quickly, fairly and sensitively, and any reporting to the Police/statutory authorities is carried out.
- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks, as part of our risk management processes.
- Ensuring that all relevant checks are carried out in recruiting staff and volunteers.
- Planning programmes/activities to take into account potential safeguarding risks, to ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that DBS clearances and training are kept up-to-date.
- Ensuring that safeguarding requirements (e.g., DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.
- Making staff, volunteers and others aware of:
 - Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
 - The signs of potential abuse and how to report these.

All new staff must complete a minimum of Level 1 safeguarding training as part of their induction. Safeguarding training must be updated every two years unless prompted sooner by changes in legislation, a safeguarding incident, or a change in the individual's role requiring higher-level training (e.g., Level 2 or DSL training).

Information sharing must comply with GDPR and the Data Protection Act 2018. Concerns should be reported promptly to local safeguarding authorities, and shared with relevant agencies only when necessary for safeguarding purposes.

8. Designated Safeguarding Lead (DSL)

The DSL is responsible for overseeing adult safeguarding practices, providing guidance and support, and acting as the main point of contact for safeguarding concerns. This role will include liaising with local safeguarding boards and statutory authorities. The DSL will have sufficient time, resources, and supervision to fulfil their responsibilities effectively.

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sarah@smca.org.uk
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- The online services we provide are suitable for our users. For example, using appropriate age restrictions and offering password protection to help keep people safe
- The services we use and/or provide are safe and in line with our code of conduct.
- We protect people's personal data and follow [GDPR legislation](#).
- We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.
- We clearly explain how users can report online concerns.

We will ensure safeguarding procedures and reporting processes are clearly communicated to users of SMCA. This will include prominent displays of safeguarding information on digital screens and in approachable formats to promote awareness and accessibility.

11. Policy Review

This policy will be reviewed annually by the Board of Trustees to ensure compliance with current legislation and best practices. Interim reviews may be conducted if significant changes in legislation or safeguarding practice occur.

Related Policies

- Recruitment and Selection Policy
- Recruitment of ex-offenders and Disclosures Procedure
- Data Protection Policy
- Induction Procedure
- Staff Training and Development Procedure
- Safeguarding Code of Behaviour
- Whistleblowing Policy

SMCA Safeguarding Procedure

Reporting Procedures

1. Anyone making a complaint, allegation, or expression of concern, whether staff, volunteers, service users, carers or members of the public should be reassured that:
 - they will be taken seriously;
 - their comments will usually be treated confidentially but that their concerns may need to be shared if they or others are at significant risk;
 - if service users, they will be given immediate protection from the risk of reprisals or intimidation;
 - if staff, they will be given support and afforded protection.
2. If an allegation is made to a member of staff or there is a suspicion of abuse, then the member of staff should inform their line manager or SMCA nominated Safeguarding Coordinator and provide all relevant information as soon as possible. If an allegation is made to a volunteer or the volunteer has a suspicion of abuse then they should inform the SMCA Duty Manager or nominated Safeguarding Coordinator and provide all relevant information as soon as possible so that the necessary follow-up action may be taken.
3. The line manager should make a written record of the allegation or suspicion of abuse on the Incident Report Form (see Appendix 1) and contact Merton Safeguarding Vulnerable Adults Team on (020) 8545 3430 or Merton Children's Team 020 8545 4226.
4. If a staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the person to make a referral to another agency. However, the gaining of the consent is not essential for information to be passed on. Consideration needs to be given to:
 - The scale of the abuse;
 - The risk of harm to others;
 - The capacity of the victim to understand the issues of abuse and consent.
5. If there is any doubt about whether or not to report an issue to the Merton Safeguarding Team then the default position is that it should be reported.
6. In emergency situations (e.g., where there is the genuine risk or severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted (999).
7. Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Good Practice Guidelines

8. As SMCA manage a venue which lets out rooms to organisations working with children, young people and adults at risk, we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusations. In line with this document please read the companion Safeguarding Code of Behaviour guidelines, outlining the principles that should be adhered to along with this procedure.

9. The diversity of organisations using the Centre means there can be significant variations in practice when it comes to safeguarding children, young people and adults. This can be because of culture, tradition, belief and religious practice or understanding, for example, of what constitutes abuse. We therefore have clear guidelines regarding our expectations of all groups that use our venue.

10. SMCA will always strive to uphold and promote good practices in the protection of children and vulnerable people.

11. It is SMCA's policy that no activities will involve unsupervised access to children or vulnerable people by either staff or volunteers.

12. We will insist that all organisations using our venue, DBS check all their volunteers and staff who work with children and vulnerable people.

13. From time-to-time SMCA may wish to take photographs or film activities for use in its promotional activities. As far as possible SMCA will seek confirmation that users are content for their pictures to be used in this way. As an added safeguard we recommend that all organisations offer parents and carers the opportunity to complete an enrolment form which outlines permissions for involvement in activities, information regarding data protection regulations and the need for consent to be included in photographs or film.

Recruitment and Training

14. SMCA will ensure that its staff & volunteers whose roles include working with adults at risk are carefully selected, screened, trained, and supervised. All trustees, staff and volunteers should attend introductory level Safeguarding Vulnerable Users training and should be responsible for completing their training and updates as required. The Strategy and Operations Manager will be responsible for maintaining a record of individuals' safeguarding training and of any updates which may be required.

Disclosure Checks

15. As part of the recruitment procedure, all newly appointed staff having contact with children, young people and adults at risk will be disclosure checked at a level appropriate to their role.

Local Contacts

1. Merton Safeguarding Vulnerable Adults Team (020) 8545 3430
2. Merton Children's Team (020) 8545 4226
3. Police 999 (emergency) (020) 8649 3576 (if not urgent)
4. Board of Charity Trustees via the SMCA Strategy and Operations Manager Sarah Grand (020) 8648 3740

Related Policies

- Recruitment and Selection Policy
- Recruitment of ex-offenders and Disclosures Procedure
- Data Protection Policy
- Induction Procedure
- Staff Training and Development Procedure
- Safeguarding Code of Behaviour
- [Whistleblowing Policy](#)

Appendices

- Appendix 1 Incident Report Form
Appendix 2 Safeguarding Definitions
Appendix 3 Whistleblowing Policy

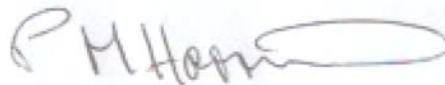
Date First Implemented: June 2021

Date Approved by Trustees: September 2024

Date of Next Review: September 2025

Signed on behalf of the board:

Pat Harrison, Charity Trustee and Acting Chair





SMCA Privacy & Cookies Policy

The type of personal information we collect

The type of information we collect and process about you will depend on the level and nature of contact and interaction you have with us, including the services we provided to you. The range of information we may currently collect, and process includes:

- Personal identifiers, contacts, and characteristics (for example, name and contact details)
- Personal contact details such as name, gender, date of birth, email address
- Home address, Phone Number
- Ethnicity, sexual orientation
- Medical information or information about disabilities
- Names of dependents, names of contact details of next of kin
- Assessment information, relevant medical information, special educational needs information, exclusions / behavioural information
- Records of events attended

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons.

We collect information about you when you visit our website or subscribe to our newsletters or publications. Information may also be sought from users who may have participated in centre activities. This maybe in the form of feedback surveys, which we can use to assist us improve our services.

The information is either needed to fulfil your request or to enable us to provide you with a more tailored service. You do not have to disclose any of this information. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

We may also gather general information about the use of our website, such as which pages users visit most often, and which are of most interest. We may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users. We will only use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

Protected characteristics

We are bound by law not to discriminate against people for reasons such as age, ethnic origin, religion, and disability. We may ask you additional questions about yourself to monitor our services, and ensure they tackle discrimination and inequality. This is called 'protected characteristics' information.

You do not have to give us this type of information. We will request your consent.

Use of Cookies

Like most websites, we use cookies. Cookies are tiny pieces of data saved on your computer or mobile device. There are several types of cookies and they each have distinct functions or uses.

We may use cookies for a variety of reasons:

(a) Essential cookies – these are required for the operation of our website, for example to enable you to log in to secure areas of the website or make use of a shopping cart and e-payment services.

(b) Analytic/performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

(c) Functionality cookies – these are used to recognise you when you return to our website so that we can personalise our content for you and remember your preferences, e.g., whether you are signed up to email alerts.

(d) Targeting cookies – these record your visit to our website, pages you have visited and links you have followed. We may use this information to make our website and the advertising displayed to you more relevant to your interests.

Marketing

Consent for use of your photographic, video, audio will be obtained separately. Any information you give us for marketing purposes e.g., in a blog post on our website, a quote on promotional material, etc will be anonymised unless you have given specific consent to be named.

How we protect your personal data

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed.

Your information will be protected from unauthorised or accidental disclosure and these principles apply whether we hold your information on paper or in electronic form. However, we cannot guarantee the security of Data in an account from unauthorised entry or use, hardware or software failure, and other factors.

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

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting brenda@smca.org.uk

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

We collect your personal information in several ways:

- When you provide it to us directly, e.g., when you enquire about our activities, make a referral for yourself or another person, send or receive an e-mail, donate to us, ask a question, or otherwise provide us with personal information;
- When you provide permission to other organisations to share it with us (including Facebook or Twitter);
- When we collect it as you use our websites;
- When you have given it to a third party and you have provided permission to pass your information on to us, e.g., when you register with a group leader or service provider;
- When a professional refers you to our services.

We combine the information from these sources with the information you provide to us directly. Where you ask us to provide a specific service, you may be asked to give consent to your data being collected. This may be verbally, online or by signed consent form, and this particularly relates to sensitive information you may not want shared.

Your Consent

By providing us with your personal information, including potentially sensitive information, if linked to our services, you consent to the collection and use of this information in accordance with the purposes described in this policy. SMCA may be funded to provide local services by a third party such as the Local Authority which have specific contractual requirements on how data is collected and used. Information may be provided by professionals or referred to us. In these instances, you may not have given formal consent. The information disclosed will be strictly limited to what is required to provide services or to comply with its legal and regulatory requirements.

How we store your personal information

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed.

Your information will be protected from unauthorised or accidental disclosure and these principles apply whether we hold your information on paper or in electronic form. However, we cannot guarantee the security of Data in an account from unauthorized entry or use, hardware or software failure, and other factors.

How we use your personal data

Personal information which we hold may be used in several ways. For example:

- to ensure efficient and accurate processing of your request;
- to operate, maintain and improve our services;
- to carry out our obligations arising from any contracts entered into by you and us;
- to process a volunteer or job application;
- to maintain contact with you;
- to send you communications which you have requested and that may be of interest to you;
- to seek your views or comments on the services we provide;
- to notify you of changes to our services;
- to provide services to the wider community;
- for protection of your rights.

The reasons we might share your personal data

We will not disclose your personal information to any organisation or person outside SMCA without your consent, except for the following reasons:

- to the extent that we are required to do so by law;
- to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention);
- to safeguard children and vulnerable adults;
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information;
- if we receive a complaint about any content that you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property, or personal safety of SMCA, our websites or our visitors and for other lawful purposes;
- if we merge with another organisation to form a new entity, information may be transferred to the new entity.

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 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.

Please contact us on 020 8648 3740 if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at brenda@smca.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

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

	Future Review Dates					
• Date Implemented	January 2023					
• Date reviewed	2024					
• Date approved By Trustees	January 2023					