



Lister Steps Privacy Policy

1. Contact information

Name: Lister Steps Ltd Ltd

Address: The Old Library, 115 Green Lane, Liverpool, L13 7EB

Telephone: 0151 228 3818

Email: hello@tol.org.uk

Website: www.tol.org.uk

1.1 Data Protection Lead contact details

Name: Julie May (Data Protection Lead)

Email: trustee@tol.org.uk

The organisation is registered as a data controller through the Information Commissioners Office. Lister Steps Ltd registration reference is Z7965822.

2. Introduction

Lister Steps Ltd Ltd is a registered charity and a company limited by guarantee, operating out of The Old Library, 115 Green Lane, L13 7EB. There are three main arms to the charity's operations: Childcare, Community & Commercial Enterprises, covering Café, Business Support & Venue Hire.

3. Scope

This privacy and cookie notice sets out how Lister Steps Ltd uses and protects any information that you give Lister Steps Ltd when you use the website, make enquiries about private/commercial/community hire, participate in events & activities or register with our childcare services. Lister Steps Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy notice. Lister Steps Ltd may update this notice from time to time. If you have opted in to receive any of our marketing and communication emails, you will receive an email notification about any updates to this notice to ensure that you are happy with any changes.

THE OLD LIBRARY

115 Green Lane

Liverpool

L13 7EB

Call 0151 228 3818

Email hello@tol.org.uk

Visit tol.org.uk

Lister Steps Ltd is a registered charity (no. 1083268)





4. Data protection policy

Lister Steps Ltd is required to collect personal information for its employees, trustees, children, parents, participants, clients & customers. It is also necessary to process information so that staff can be recruited and paid, activities organised and legal obligations to funding bodies. We meet all the requirements of the Data Protection Act 1998 (the Act) and the General Data Protection Regulations 2018 when collecting, storing, and destroying personal data.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Lister Steps Ltd must comply with the Data Protection Principles which are set out in the Data Protection Act 1998. In summary these state that personal data must be:

- obtained and processed fairly and lawfully
- obtained for a specified and lawful purpose and not processed in any manner incompatible with that purpose; adequate, relevant, and not excessive for that purpose
- accurate and kept up to date
- not kept for longer than is necessary
- processed in accordance with the data subject's rights
- kept safe from unauthorised access, accidental loss, or destruction
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

All Lister Steps Ltd staff/apprentices/trainees and volunteers who process or use any Personal Information must ensure that they follow these principles at all times. In order to ensure that this happens, Lister Steps Ltd has adopted this Data Protection Policy.

5. How we use your personal information

5.1 Why do we collect your information?

Childcare

We collect and hold personal information relating to children, parents & families during our registration process and may also receive information from external authorities such as LEA, Children's Social Care, Public Health England & DfE.





We use this personal data to:

- contact parents & carers
- monitor children's learning & development
- record key information around child or family needs
- look at trends in service users to support grant applications & report back to funders

We collect this data to comply with the statutory framework (EYFS 2017); to deliver services to our families e.g. government funding and to help protect the vital interests of the children in our care. At point of registration, parents/carers will be asked to sign a consent form indicating which information can be recorded, held & shared as appropriate.

We comply with the Data Protection Act 2018 and all General Data Protection Regulations (GDPR) and all subsequent UK legislation relating to the protection of records, including removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

Community

We collect & hold personal information relating to participants at community events & activities, as well individuals, groups & organisations who make enquiries and bookings for community hire.

We use this personal data to:

- Monitor & evaluate individual & group participation, outcomes & impacts
- Look at trends in participation to inform future areas of development and funding applications
- Report back to funders
- Contact you regarding your booking/enquiry
- Send out material relating to your booking/enquiry
- Send out marketing material relating to other business areas within the organisation

We will request your consent to use your information in this way at the time of enquiry, booking or participation, by requesting that you tick the consent box on the relevant form or by email.

We comply with the Data Protection Act 2018 and all General Data Protection Regulations (GDPR) and all subsequent UK legislation relating to the protection of records, including





removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

Commercial Enterprises

We collect and hold personal information relating to you from enquiries and bookings made through our commercial business areas: Café, Business Support & Venue Hire.

We use this personal data to:

- Contact you regarding your booking/enquiry
- Send out material relating to your booking/enquiry
- Send out marketing material relating to other business areas within the organisation
- Look at trends in our customer & client base to inform future business

We will request your consent to use your information in this way at the time of enquiry/booking either by requesting you tick the consent box on the relevant form or by email. Please note that all enquiries that do not lead to a booking are recorded for reporting purposes only.

We comply with the Data Protection Act 2018 and all General Data Protection Regulations (GDPR) and all subsequent UK legislation relating to the protection of records, including removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

5.2 What information do we collect?

Personal Information is defined as any details relating to a living, identifiable individual. Within Lister Steps Ltd this relates to employees; attending children and their families; trustees; professional visitors; participants; volunteers; clients; customers and some members of the public e.g. job applicants.

Examples of the personal information that may be collected from individuals is listed below. In all cases we will ask your consent to record this information in accordance with Article 9(a). Any sensitive personal information we collect from you will never be supplied to anyone outside Lister Steps Ltd without first obtaining your consent, unless required or permitted by law:

Childcare

- Contact information (name, address, email address, telephone number including those of emergency contacts)





- Date of birth
- Demographic & sensitive information as required*
- Medical information & family medical history when necessary
- Observations of children's progress (learning journals) Tapestry
- Children's reports, preschool or from outside professionals
- Photographs
- National Insurance & DBS numbers for employee applicants & volunteers

Community

- Contact information (name, address, email address, telephone number including those of emergency contacts)
- Date of birth
- Demographic & sensitive information* (such as gender, ethnicity, religion, sexuality, disability, employment, household income)
- Wellbeing & personal growth measures
- Additional support needs & relevant background information
- DBS numbers as required for volunteers

Commercial Enterprises

- Contact information (name, address, email address, telephone number including those of emergency contacts)
- Special requirements around access

* Sensitive information is defined by the Act as that relating to ethnicity, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, criminal proceedings or convictions. The person about whom this data is being kept must give express consent to the processing of such data, except where the data processing is required by law for employment purposes or to protect the vital interests of the person or a third party.

5.3 Who collects the information?



Information provided through our website will be designated to the relevant Lister Steps Ltd staff via the appropriate email inboxes across areas of the business. Information provided when signing up to mailing lists will be stored directly on our Mailchimp platform.

All other information is collected by staff at Lister Steps Ltd who are aware of the requirements to treat personal data in a private and secure manner. All staff and volunteers who process or use any Personal Information are responsible for ensuring that:

- Any Personal Information which they hold is kept securely
- Personal Information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

5.4 How is the information collected?

Childcare

The information is collected primarily during our registration process. Initial enquiries may be made in person, via telephone, via email or via our website, followed by a paper/digital enquiry form and an in person registration meeting where information is submitted directly into our CRM system (Lamplight). Further information may be collected throughout your relationship with Lister Steps Ltd as a childcare user to ensure that children & families records stay up to date. Childcare staff will also record information around children's learning & development through Tapestry, which can be shared securely with parents.

Community

The information is collected upon enquiry, booking or participation. This will be done in person, via telephone, via email or via our website. Registration will be required to participate in all events & activities to meet health & safety regulations. Personal information may be collected before, during or events & activities through paper/digital surveys. Further information may be collected for long-term participants & volunteers to measure well-being and personal growth. In all cases we will ask your consent to record this information in accordance with Article 9(a).

Commercial Enterprises

The information is collected upon your first enquiry with regards to one of business areas. This will be done in person, via telephone, via email or via our website. Further information may be collected at the point of booking and when liaising with our Events Manager/Lister Steps Ltd staff over your booking.





5.5 How do we store your information?

Lister Steps Ltd takes care to only store personal information that is absolutely necessary. Personal information is stored in our secure CRM system (Lamplight). Access to computerised data is restricted to the appropriate staff. Some paper records regarding sensitive information are stored, where necessary, with limited staff access in secure filing cabinets.

The length for which we may need to store personal information varies across different business areas; this may be governed by the requirements of external bodies such as OFSTED. Data is annually archived or anonymised and retained for reporting purposes as appropriate.

5.6 How do we share your information?

We will not give information about you to anyone without your consent, unless the law and our policies allow us to do so. We do not pass on information to third parties for the marketing of goods or other paid for services.

Childcare

Information you provide will be retained in our CRM system so that it can be accessed by members of Lister Steps Ltd childcare staff as necessary during work hours. Senior Managers will also have oversight of this information for administration purposes & in case of emergency.

Upon registration, we will ask your consent around sharing some of the information we record, such as photographs of children in our setting which may be used for promotional purposes. We will only share personal information relating to children & families where there is a legal duty to disclose, for example, if safeguarding concerns arise or if external agencies (such as Children's Social Care, PHE, DfE, LEA, etc.) request this information from us.

Community

Information you provide will be used for monitoring, evaluation & reporting purposes such as grant applications, funding reports and promotional materials. Data is usually anonymised before it is shared with third parties for these purposes. Lister Steps Ltd will only share information which has not been anonymised, such as photographs of you taking part in an activity or feedback on your experiences, when we have your consent; this is usually requested when the information was initially recorded or in some cases, we may contact you directly afterwards to ask your consent if necessary.

Commercial Enterprises



We only share your information internally with our other business areas. This helps us to give you the best service possible by informing you of other opportunities we can offer you.

Across all areas of the business, there is a legal duty to disclose certain information, namely, information about: child abuse, which will be disclosed to social services, or drug trafficking, money laundering or acts of terrorism or treason, which will be disclosed to the police.

6. Cookies

6.1 How we use cookies

Cookies do not provide Lister Steps Ltd with your personal information but they do provide information about how our website is used. We may collect the following information:

- How many visitors we've had to our site
- How people interact with the site, i.e. what pages you visit
- Whether you've been a previous visitor to the website
- What country you are accessing our site from
- How long you spend on each page

Cookies only collect data about how your browser is used on your device. No personal information is collected or provided.

We use the information provided by the cookies to improve our website and the services it offers to our visitors.

6.2 Third party cookies

We use a number of third party platforms which also collect cookies. Below is a list of those platforms and the links to their privacy and cookies policies.

Platform	Purpose	More information
Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to	Google privacy policy



	help us improve our site. No personal data is collected.	Google Analytics Opt Out
Facebook	To promote upcoming events, activities & offers, to engage with our community & to share news about the work of Lister Steps Ltd	Facebook privacy policy Facebook cookies policy
Twitter	To promote upcoming events, activities & offers, to engage with our community & to share news about the work of Lister Steps Ltd	Twitter privacy policy Twitter cookies policy
Instagram	To promote upcoming events, activities & offers, to engage with our community & to share news about the work of Lister Steps Ltd	Instagram privacy policy Instagram cookies policy
Mailchimp	To send newsletters and marketing information to our mailing lists	Mailchimp privacy policy Mailchimp cookies policy
Vimeo	To share videos of the work of Lister Steps Ltd & partners across all business areas	Vimeo privacy policy Vimeo cookies policy
Eventbrite	To promote & sell event tickets	Eventbrite privacy policy Eventbrite cookies statement



Zoom	To host meetings and deliver engagement or training events	Zoom privacy policy Zoom cookies policy#
------	--	---

7. Consent

7.1 Handling personal information based on consent

Some personal information we collect will be done so exclusively based on consent. Processes we need consent for are:

- Marketing
- Newsletters
- Cookies

It is understood when giving consent for these processes that it can be withdrawn or amended at any time. This can be done via the method in which you gave consent initially or by contacting the data protection team trustee@tol.org.uk

8. Information retention

8.1 How long do we keep your records?

The retention period of all the information and documentation we process is subject to the different classifications of data. All retention periods for each of these classifications can be found in Data Retention Policy. You can request this from our Data Protection Lead at trustee@tol.org.uk.

8.2 Your Rights

You have significant legal rights in respect of the data that we process in relation to your engagement with Lister Steps Ltd, and the key points are detailed below:

- Subject Access Request (SAR) – you may request copies of all the information Lister Steps Ltd stores relating to you including details relating to the rights of data subjects. In accordance with the regulations we do not charge a fee for SAR requests, however, a fee may apply under certain circumstances. We will provide the data requested within the regulated timeframe of one calendar month from the date of the request. If we





deem the request to be complex or we have received a number of requests from you we may extend this timeframe by a further two months. We will inform you of the reasons for the extension before the initial one calendar month has passed.

- Right to correct data – you may ask for data held by Lister Steps Ltd to be corrected where applicable.
- Right to erasure (the right to be forgotten) – you may request for Lister Steps Ltd to delete all information relating to you where the data is no longer needed for its original purpose.
- Right to restrict processing – you may request that the information we store is strictly limited in use to the sole purpose of your engagement with Lister Steps Ltd. In this circumstance we will not share any of your information, other than with the statutory bodies described in this document, as necessary.
- Right to data portability – you may ask to receive a copy of all information held by Lister Steps Ltd in a common format to allow transfer to another organisation.
- Right to object – you may object to our use of their data on certain grounds.
- Right to complain – you have the right to complain if Lister Steps Ltd has used your data in a manner that has infringed your rights. This can be directly to Lister Steps Ltd Ltd in which case we will do all we can to satisfy the complaint, alternatively a complaint can be made directly to the Information Commissioners Office.

To exercise any of these rights please contact the Data Protection Lead in writing using the email address at the beginning of this document.

To raise a concern with the Information Commissioners Office please access the following web page - <https://ico.org.uk/concerns>

8.3 Our legal rights

The information we collect is necessary when providing a service through our business areas or is required by law. You must provide it in order to access the services provided by Lister Steps Ltd.

We use your data for specific purposes, for a list of the processes involved and our legal right to process your data please contact the Data Protection Lead.





8.4 Our responsibilities

Lister Steps as a registered charity is the Data Controller under the Act, and the organisation is therefore ultimately responsible for implementation. However, Designated Data Controllers will deal with day to day matters. Our Designated Data Controllers are:

- Gaynor Williams – C.E.O
- Michelle Clarke – Childcare Manager
- Elizabeth McCarthy – Deputy Childcare Manager
- Laura Richardson – Events Manager
- Olivia Johnson – Community Engagement Manager
- Lister Steps Board of Trustees

