

## Buttle UK Privacy Policy: How we use grant applicant’s and co-production participant’s data

At Buttle UK we respect your privacy, and we protect your personal information. This Privacy Policy describes how we collect and process your data when you, the grant applicant, apply for a **Boarding Grant** or a **Chances for Children Grant** from us, whether you apply directly or someone else applies on your behalf. It also covers how we collect and use data for those participating in our **co-production activity**, e.g, Youth Panel or Advisor Network.

We only collect personal data from you that we need to award our grants and run our charity, and we use your data in ways that you would reasonably expect us to.

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## Who we are

We are Buttle UK, a charity registered with the Charities Commission in England & Wales (registration number 313007) and the Office of the Scottish Charity Regulator in Scotland (registration number SC037997). We are a charitable trust and so the Trustees of Buttle UK control and are responsible for your personal data. Our address is 15 Greycoat Place, London SW1P 1SB.

## The data we collect about you

Personal information is any information that can be used to identify a living person. We currently collect and process the following information about you, which depends on whether you're applying for a **Chances for Children** grant, a **Boarding** grant or participating in **co-production activity**:

### 1. As a grant applicant or co-production participant:

- **Contact Data** including first name, last name, address, email address, telephone number.
- **Communications Data** including emails and notes of conversations.
- **Relevant Personal Data** including gender, date of birth, reasons for application.
- **Family Data** including the names and ages of any children and any other adults at the home address.
- **Financial Data** including income, benefits, debts and employment details.
- **Special Category Data** including data revealing or concerning a person's racial or ethnic origin, health and medical conditions, religious or philosophical beliefs (this may be relevant if you apply for a place in a faith Boarding school), sexual orientation.
- **Criminal Offence or related data** including information about criminal offences, allegations, proceedings or convictions, descriptions of criminal incidents.
- **Social Services Data** including social services reports and family conference minutes.
- **Education and Training Data** including school name, school reports, contact information (this only applies to Boarding school places).
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use, if you access Buttle's website or the Grant Management system.
- **Usage Data** including information about your use of our service, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); elements you viewed or words you searched for; page response times; download errors; length of visits; interaction information (such as scrolling, clicks, and mouse-overs).
- **Evaluation Data** including feedback you share with us when you participate in surveys and other research activities.

### 2. Aggregated Data

- We also collect, use and share **Aggregated Data**, for example statistical or demographic data including to monitor and evaluate the impact of our grant-making.

- Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.
- However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in line with this privacy notice.

## How we get your personal information

We collect data from and about you in different ways, depending on whether an application is made on your behalf for a **Chances for Children** grant; if you apply directly for a **Boarding** grant or choose to participate in our **co-production activity**.

Chances for Children Grant Applicant	Boarding Grant Applicant
<p>Most applications are made via our online application form by a <b>referrer</b> who are professional support workers from public and third sector organisations. We collect data via our grant application form, phone calls and emails including:</p> <ul style="list-style-type: none"> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Relevant Personal Data</li> <li>● Family Data</li> <li>● Financial Data</li> <li>● Special Category Data</li> <li>● Criminal Offence or related data</li> </ul>	<p>Most applications are <b>made directly</b> by families or referrers via the online application form, although information might also be collected by telephone calls, emails and visits to the family home, including:</p> <ul style="list-style-type: none"> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Relevant Personal Data</li> <li>● Family Data</li> <li>● Social Services Data</li> <li>● Education and Training Data</li> <li>● Financial Data</li> <li>● Special Category Data</li> <li>● Criminal Offence or related data</li> </ul>
<p><b>Co-Production participant</b> Data about co-production participants will be collected from grant applications and directly from individuals via a consent form, events and discussions. It includes:</p> <ul style="list-style-type: none"> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Relevant Personal Data</li> <li>● Family Data</li> <li>● Social Services Data</li> <li>● Education and Training Data</li> <li>● Financial Data</li> <li>● Special Category Data</li> <li>● Criminal Offence or related data</li> </ul>	
<p><b>Direct interactions:</b> We also collect data when you visit our website, contact us via our website, engage in our co-production and research activity, correspond with us by phone,</p>	

post, email or contact us. For example, you may share your Contact and Communications Data when making an enquiry about our Grants via our website, by phone or email.

**Third parties or publicly available sources:** We may receive personal data about you from various third parties, for example:

- At times, we get referrals from Boarding Charities or Boarding Schools, who share Contact Data, Relevant Personal Data, Family Data, Education and Training Data.
- Evaluation Data when you participate in surveys using SurveyMonkey and other research activities.
- Technical and Usage Data from analytics providers such as Google based outside the EEA who provide server monitoring tools for our Grant Management system.

**Automated technologies or interactions:** As you interact with our website and or apply for a grant using our Grant Management system, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

## Why we collect your data and how we use it

We only use your personal data when the law allows us to, in ways you would reasonably expect from us. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we most commonly rely on for processing your personal information are where it is **necessary for our legitimate interests** and where you have given us **consent**.

Where it is **necessary for our legitimate interests (or those of a third party)** and your interests and fundamental rights do not override those interests:

- We provide support designed to improve emotional, educational and social outcomes through our Chances for Children grants and, for some children whose home environment is particularly disruptive and chaotic, grants which allow them to go to boarding school. When an organisation applies to us on your behalf, or when you apply directly to us, we ask for certain personal information about you so that we can work out whether or not we can provide grant funding to you. We also use that data to understand the impact of that funding and how our grant making might improve. Without certain information we cannot offer, and continue to offer, individuals and families a grant which might benefit them.
- In some circumstances, **you have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party)** but you feel that us processing this data will impact on your fundamental rights and freedoms. In some cases, we may show that we have compelling legitimate grounds to process your information and where these override your rights and freedoms.

Where you have given us **your consent**:

- We gather consent at the point of application when the applicant contacts us to ask for support. When an application is made on the applicant's behalf, we ask the referrer to verify they have got your consent to share your data. We ask for consent

as an additional legal safeguard as we sometimes collect sensitive data (see below). We also ask for your consent in other circumstances, for example, to take part in our Youth Panel or Advisory Network for co-production activity, evaluation surveys or before we share your data with others, e.g. after an exploratory conversation by email or phone, we share data with Boarding schools or charities when the parent has said that the information can be shared.

- You have the right to withdraw consent or **opt-out** at any time.

We collect sensitive data as part of the application and to support effective and safe co-production activity, legally defined as **special category data** and **criminal offence or related data**.

- Grant applications - we only collect this information if you want us to know about it to support your application. If someone is applying on your behalf, we ask the referrer to verify they have your consent to share the information. We ask applicants and referrers to share information that is sufficient, relevant and limited to what is necessary for us to make a decision. There are stronger safeguards in place to protect this kind of information and the law only allows us to use it in certain circumstances, e.g. we can use special category data when we have your consent. For criminal offence data, different conditions apply.
- Co-production activity - we collect special category data to ensure group membership is representative. We may collect criminal offence data to support safeguarding during extended co-production group activity.
- You can ask us to **stop processing** this information at any point. You can contact us on [privacy@buttleuk.org](mailto:privacy@buttleuk.org) for more details.

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. For example, the organisation applying on your behalf may confirm that sharing the information:

- is necessary in order to protect the vital interests of the data subject or of another natural person
- is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

We have set out below how we plan to use your data, the type of data and the legal justification we rely on to process your data. We have identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing
To assess and award a Chances for Child or Boarding grant application and communicate with you	<ul style="list-style-type: none"> <li>a) Contact</li> <li>b) Communications</li> <li>c) Relevant Personal</li> <li>d) Family</li> <li>e) Social Services</li> <li>f) Financial</li> </ul>	Necessary for our legitimate interests (to administer grants to support individuals who are seriously affected by financial hardship and crisis)

	<ul style="list-style-type: none"> <li>g) Education and Training</li> <li>h) Special Category</li> <li>i) Criminal Offence or related</li> </ul>	Consent (an additional legal requirement to process special category data, to share data with Boarding schools and Boarding charities)
To provide on-going support for Boarding grant applicants	<ul style="list-style-type: none"> <li>a) Contact</li> <li>b) Communications</li> <li>c) Education and Training</li> <li>d) Social Services Data</li> <li>e) Financial</li> <li>f) Special Category</li> <li>g) Criminal Offence or related</li> </ul>	Necessary for our legitimate interests (to contact families annually who applied for Boarding grants for an update, especially if their situation changes, and to release further funding)
To provide household goods, services or direct financial support to grant applicants	<ul style="list-style-type: none"> <li>a) Contact</li> <li>b) Communications</li> <li>c) Financial Data</li> </ul>	Necessary for our legitimate interests (to provide support to individuals who are seriously affected by financial hardship and crisis)
To administer our charity and manage our relationship with you, including contact, monitoring and interaction through our co-production and research activity	<ul style="list-style-type: none"> <li>a) Contact Data</li> <li>b) Communications Data</li> <li>c) Relevant Personal Data</li> <li>d) Family Data</li> <li>e) Social Services Data</li> <li>f) Education and Training Data</li> <li>g) Financial Data</li> <li>h) Special Category Data</li> <li>i) Criminal Offence or related data</li> </ul>	<p>Necessary for our legitimate interests (to develop and tailor our charity offering appropriately, to promote our charitable services to support individuals who are seriously affected by financial hardship and crisis, to identify gaps in service provision, to answer website enquiries, to keep our records updated and to understand how our charity is operating and its impact)</p> <p>Consent (to send applicants surveys or to take part in other research and evaluation activities)</p>
To administer and protect our charity, our website and the grant management system (including troubleshooting, data	<ul style="list-style-type: none"> <li>a) Contact</li> <li>b) Communications</li> <li>c) Technical</li> <li>d) Usage</li> <li>e) Financial</li> </ul>	Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud, and to

analysis, testing, system maintenance, support, reporting and hosting of data)	f) Aggregated	monitor/improve use of the grant management system)
To deliver relevant website content	a) Contact b) Communications c) Technical d) Usage e) Aggregated	Necessary for our legitimate interests (to study how individuals use our website, to grow our charity and to inform our marketing strategy)
To use data analytics to improve our grant management system, website, our services, marketing, customer relationships and experiences	a) Technical b) Usage c) Aggregated	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our charity, and to monitor and improve use of the grant management system)  Consent (we use cookies and/or other similar technologies on our website)
To raise public awareness, inform our strategy and drive our fundraising	a) Evaluation b) Aggregated	Necessary for our legitimate interests (to raise public awareness, inform our strategy and eligibility criteria to focus our grants on those groups who most need it, drive our marketing and fundraising activities)  Consent (to send applicants surveys or ask if they want to take part in fundraising, marketing or research activities)

## Data sharing and third parties

We may share your personal data with the parties below for the reasons set out in the section on why we collect your data and how we use it.

- Payment providers to give direct financial support to applicants (usually via referrers) including cheques and prepaid cards so we may share limited details with them.
- Companies to provide goods and service to applicants including white goods, beds, internet access or other elements of the grant so we may share limited details to support delivery / returns.

- We work with partner schools and other funders to build fully funded bursaries in residential schools so that young people can attend boarding schools and benefit from the environment, so we share anonymised data with schools/boarding charities before sending personal data to help them decide. We do not share information with a school until the family gives consent after we explain why we are sharing the data.
- Third party IT service providers including email marketing providers like MailChimp, Customer Relationship Management systems like Makerble, assessment portals like Lightning Reach, online survey providers like Survey Monkey, messaging platforms like MessageBird and cloud service providers to manage our communications and evaluation.
- HCS Technologies provide our grant management system, built on several technologies including Google Cloud, Elasticsearch and Groove.
- Google LLC provide our Google cloud based internal office system including e-mail.
- Funders and evaluation partners have anonymised data shared with them.

We require all third parties to keep your personal data safe and secure and to treat it in accordance with the law.

We do not allow our third-party service providers (i.e., data processors) to use your personal data for their own purposes and only allow them to process your personal data for specified purposes and in accordance with our instructions. Where we share data with data processors, we ensure we have the relevant contracts in place. Where we share data with other organisations (i.e., data controllers), we ensure there is a written agreement in place.

Where the data may be transferred outside the EEA, we ensure personal data is given a similar degree of protection as data transfers within the EEA by having the relevant contractual obligations in place with our service providers, with the relevant technical safeguards.

## How we store your personal information

### Data security

Your information is securely stored in the EEA apart from data we transfer to Google's systems as part of our Grant Management System, which is stored in the US. Data processed for co-production activity is stored in the EEA.

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## Data retention and deletion

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. This is usually for seven years from the closure of a grant.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

In some circumstances you can ask us to delete your data. For specific information about our data retention policies, please contact us on [privacy@buttleuk.org](mailto:privacy@buttleuk.org).

## Your data protection rights

You have several rights under data protection law and you normally do not need to pay a fee for exercising your rights.

- 1. Your right of access (data subject access request):** You have the right to ask us for copies of your personal information and to check that we are lawfully processing it.
- 2. Your right to rectification:** You have the right to ask us to correct personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. We may need to verify the accuracy of the new data you give us.
- 3. Your right to erasure:** You have the right to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. We may not always be able to comply with your request of erasure for specific legal reasons which we will tell you, if applicable, at the time of your request.
- 4. Your right to object to processing:** You have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) but you feel that us processing this data will impact on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes, which is an absolute right so we must stop processing if you object. In some cases, we may show that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 5. Your right to restriction of processing:** You have the right to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- 6. Your right to data portability:** You have the right to ask us to transfer the personal information you gave us to another organisation, or to you, in certain circumstances. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Where we rely on legitimate interests to process your personal data, this right does not apply.

If you make a request against any of the rights listed above, we have one month to respond to you. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will tell you and keep you informed.

We might ask you for specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

To make a request, please contact us at [privacy@buttleuk.org](mailto:privacy@buttleuk.org) or phone us on 020 7828 7311.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You will also find further information about your personal data rights under the current UK General Data Protection Regulation (UK GDPR) at the ICO's website: <https://ico.org.uk/>.

## How to contact us

We do our best to keep the information we hold about you accurate and up to date. If you have any questions about your personal data that are not explained here, please feel free to contact us at [privacy@buttleuk.org](mailto:privacy@buttleuk.org).

## Changes to this privacy notice

This privacy policy was last updated on 30 March 2023.