# Privacy and Cookies Policy Big Brothers Big Sisters UK Foundation

Version Control			
Approved By	Sarah Brennan		
Version	1.2		
Policy became operational on:	TBC		
Next Review Date	July 2023		

## **Privacy and Cookies**

Big Brothers Big Sisters UK Foundation understands that your privacy is important to you and you care about the use of your personal data. We respect and value the privacy of our beneficiaries, volunteers, suppliers and all individuals whose data we process; this privacy statement explains what personal data or information we collect from you at various points of your engagement with us, and from people who visit our website, and how we use it. We would encourage you to read the information below.

#### Who are we?

Big Brother Big Sisters UK Foundation is a registered company (02881879) and a registered charity (12043014). Our registered office address is: 6 Wingfield Close Ewelme Wallingford OX10 6JY. Big Brothers Big Sisters UK Foundation is a registered data controller (ICO registration number ZB194507).

#### What is Personal Data?

"Personal data" is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data means, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## What personal data or information do we collect?

We collect personal data about freelancers, our project partners (e.g. charities delivering our services locally, and Local Authorities) funders, and suppliers. In addition, our project partners will collect information about volunteers (Big Siblings), children (Little Siblings) and their parents/guardians, prospective volunteers, and social workers. We do not routinely have access to this data, but provide the Digital Platform it is managed on so may access it in certain, limited circumstances described in more detail below.

The personal information we collect may include your name, address, email address, IP address, and information regarding what pages you access on this website and when. Further details about the nature of data we collect for each set of individuals is provided below.

## How do we collect data or information from you?

We collect personal information about you when you:

Make an enquiry via our website or via the telephone

- Volunteer, or apply to volunteer, with one of the BBBS UK local programmes as a Big Sibling
- Are referred to or benefit from BBBS services as a Little Sibling
- Are a parent or guardian of a child benefitting from BBBS Services as a Little Sibling
- Work with us as a partner to deliver BBBS Services locally
- Register on the BBBS UK Digital Platform as a user
- Work for or with the organisation
- Exchange business cards with a member of the organisation

## How is your information used?

We collect your personal data or information to operate the charity effectively and provide a high-quality service. Our model operates with local partners, such as charities and local authorities, delivering our services in a geographic area. All our partners will use the BBBS UK Digital Platform to manage the matching process between Big Siblings and Little Siblings, to monitor the relationship as it develops between the Siblings and to understand the impact of the programme on the children involved.

We, or our partner organisations, may use your information:

- To deliver services to you.
- To match our volunteers (Big Siblings) with our beneficiaries (Little Siblings).
- To answer enquiries that you make prior to any agreement or contract with us.
- To understand the impact of our services on our beneficiaries and our volunteers
- To process an application to volunteer with us
- To manage our contract with you as a freelancer working for us
- To fulfil our obligations as a responsible charity
- To maintain security of our IT infrastructure
- To report to funders on our activities and impact
- To manage our funding agreements and track financial transactions

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting the charity, our contractual requirements to deliver agreed services to you through our partners, and our legal obligations. If you would like to know more, please read below:

Information our partner organisation collects via the BBBS UK Digital Platform to deliver services locally:

- Volunteers (Big Siblings)
- Prospective Volunteers
- Beneficiaries (Little Siblings)
- Social Workers

#### Information BBBS UK collects directly

- Freelancers / Contractors
- Trustees

- Project Partners (e.g. Charities delivering our services locally, Local Authorities)
- Funders
- Suppliers

# Information our partner organisation collects via the BBBS UK Digital Platform to deliver services locally

## Volunteers (Big Siblings)

As a Big Sibling, our partner organisation will hold the following information about you and manage this using the Digital Platform provided by BBBS UK:

- Name, date of birth and contact information.
- Information relating to your qualifications, memberships and experience, particularly with young people
- Demographic information such as postcode, preferences and interests
- Motivations for volunteering on the programme
- DBS checks and Criminal Offence details
- Health information, if relevant to volunteering opportunity
- References
- Activities undertaken with Little Sibling
- Information and reports relating to your activities with your Little Sibling, including communications with you, issues you might raise with us or any requests for support that you make.

Your information is stored in the BBBS UK Digital Platform, which is routinely accessed and managed by our partner organisation responsible for the BBBS UK programme in your area. As the umbrella organisation, we do not routinely access your personal data but may need to do so in limited circumstances (e.g. IT troubleshooting or maintenance, or in case of complaint or safeguarding concerns reported to us).

We report on aggregate data derived from data our partner organisation collects on the Digital Platform to understand activity levels and impact of the BBBS UK programme in each area and overall. If we have direct communications with you, these will be stored in our email system.

Your details will be retained on the platform for the duration of our partner organisation's relationship with you, and for a minimum period of 6 years after your availability to volunteer on the programme has ceased.

For further information about other ways they may process your personal data, please contact our partner organisation directly.

#### **Prospective Volunteers**

When you apply to become a Big Sibling, our partner organisation will hold the following information about you and manage this using the Digital Platform provided by BBBS UK:

- Name, date of birth and contact information.
- Information relating to your qualifications, memberships and experience, particularly with young people
- Demographic information such as postcode, preferences and interests
- Motivations for volunteering on the programme
- DBS checks and Criminal Offence details
- Health information, if relevant to volunteering opportunity
- References

Your information is stored in the BBBS UK Digital Platform, which is routinely accessed and managed by our partner organisation responsible for the BBBS UK programme in your area. They use this information to decide whether to accept you onto the programme. As the umbrella organisation, we do not routinely access your personal data but may need to do so in limited circumstances (e.g. IT troubleshooting or maintenance, or in case of complaint or safeguarding concerns reported to us).

We report on aggregate data derived from data our partner organisation collects on the Digital Platform to understand numbers of applications received. If we have direct communications with you, these will be stored in our email system.

Where the relationship with you does not progress beyond application stage, your details are retained in the digital platform for a period of 1 year. On occasion, it may be necessary for our partner organisation to retain your data for a longer period. They will include this in their own privacy notice.

For further information about other ways they may process your personal data, please contact our partner organisation directly.

## Beneficiaries (Little Siblings)

As a Little Sibling, our partner organisation will hold the following information about you and manage this using the Digital Platform provided by BBBS UK:

- Name, date of birth, gender and contact information.
- Information relating to your school, neighbourhood location
- Information about your characteristics, preferences, hobbies and interests
- Behavioural issues
- Health information, if relevant to activities that may be undertaken with a Big Sibling.
- Information about the potential benefits to you of participating in the programme.
- Activities undertaken with your Big Sibling
- Information about your family and living circumstances
- Information relating to your activities with your Big Sibling, including their opinions about you, how you're feeling, or any issues they may be concerned about.
- Information relating to the impact of the programme on you.

Your information is stored in the BBBS UK Digital Platform, which is routinely accessed and managed by our partner organisation responsible for the BBBS UK programme in your area. Local Authority partners may also have access to your information through a data sharing agreement with our partner organisation. As the umbrella organisation, we do not routinely access your personal data but may need to do so in limited circumstances (e.g. IT troubleshooting or maintenance, or in case of complaint or safeguarding concerns reported to us).

We report on aggregate data derived from data our partner organisation collects on the Digital Platform to understand activity levels and impact of the BBBS UK programme in each area and overall. If we have direct communications with you or your family, these will be stored in our email system.

Your details will be retained on the platform for the duration of our partner organisation's relationship with you, and for a minimum period of 6 years after your involvement in the programme

For further information about other ways they may process your personal data, please contact our partner organisation directly.

#### **Social Workers**

As a Social Worker, our partner organisation will hold the following information about you and manage this using the Digital Platform provided by BBBS UK:

- Name, job title and business contact information.
- Information relating to your local authority or county council location
- Login credentials

Your information is stored in the BBBS UK Digital Platform, which is routinely accessed and managed by our partner organisation responsible for the BBBS UK programme in your area. As the umbrella organisation, we do not routinely access your personal data but may need to do so in limited circumstances (e.g. IT troubleshooting or maintenance, or in case of complaint or safeguarding concerns reported to us).

We report on aggregate data derived from data our partner organisation collects on the Digital Platform to understand activity levels and impact of the BBBS UK programme in each area and overall. If we have direct communications with you, these will be stored in our email system.

Your details will be retained on the platform for the duration of time the child(ren) you are social worker for are involved in the BBBS UK programme and for a minimum period of 6 years after the end of their involvement with us.

For further information about other ways they may process your personal data, please contact our partner organisation directly.

## Information BBBS UK collects directly

## Freelancers / Contractors

When you work for us, we may hold the following information about you:

- Name, date of birth, and contact information
- Information relating to your qualifications and experience
- References
- Information and documents relating to your performance and achievement of agreed objectives, including communications with you
- Financial information, such as bank details, contract agreements and your chargeable rates

We store your information on G:Suite, which we use to manage our documents, and within Trello which we use to manage our projects and related activities. We will also store communications with you within our email system.

We may also store information about you to provide you with access to the National Level of the BBBS UK Digital Platform. This will be basic contact information and user credentials.

We will retain your personal data for the duration of your contract with us and for a period of 7 years after that contract ends.

#### **Trustees**

When you are a Trustee (and Director) of the organisation, we will hold the following information about you:

- Name, date of birth, and contact information
- Business contact information
- Information relating to your qualifications and experience
- References
- Information and documents relating to your role as a Trustee with the organisation, including communications with you
- Financial information

We store your information on G:Suite, which we use to manage our documents, and within Trello which we use to manage our projects and related activities. We will also store communications with you within our email system.

We are required to share your details with Companies House and the Charities Commission as part of our reporting requirements as a charity.

We will retain your personal data indefinitely for historical purposes as required by law.

## Project Partners (e.g. Charities delivering our model locally, Local Authorities )

As an individual working within one of our project partners, we may hold the following information about you:

- Name and business contact information.
- Financial information relating to your organisation
- Information relating to your organisation's activities
- Information and documents relating to the service delivery model we are developing with you, including communications with you.
- User credentials

We store your information on G:Suite, which we use to manage our documents, and within Trello which we use to manage our projects and related activities. We will also store communications with you within our email system.

We may also store information about you to provide you with access to the local chapter level of the BBBS UK Digital Platform. This will be basic contact information, job title and user credentials.

We will retain your personal data for the duration of your organisation's agreement with us and for a period of 7 years after that contract ends. If you leave the organisation, your user credentials will be deactivated and you won't have access to the BBBS Digital Platform beyond your leaving date.

#### **Funders**

When we receive funding through funding bodies or grant programmes, we will collect the following information about our point of contact within the organisation (Funding/Grant Managers):

- Name and business contact information, including email address.
- Information relating to your business activities (if relevant)

We store your information on G:Suite, which we use to manage our documents, and within Trello which we use to manage our projects and related activities. We will also store communications with you within our email system.

We retain your information for the duration of the funding agreement. Financial records are retained for 7 years after the end of the current financial year in line with accounting requirements and your details may appear in these records.

#### Suppliers

When you work with the organisation as a supplier, we may hold the following information about you:

- Name and business contact information.
- Information relating to your qualifications and experience
- Information relating to your business activities
- Information and documents relating to the services or products you offer, including our communications with you.
- Financial information

We store your information on G:Suite, which we use to manage our documents, and within Trello which we use to manage our projects and related activities. We will also store communications with you within our email system.

We will retain your information for the duration of our relationship with you and for 2 years after the last purchase we made with you. Financial records are retained for 7 years after the end of the current financial year in line with accounting requirements and your details may appear in these records.

## Who has access to your information?

We limit access to your personal data to those contractors and third-party processors (see below) who have a legitimate need to know and ensure that they are aware of their duty of confidentiality.

We do not sell or rent your personal data or information to any third party or share your information with third parties for their own marketing purposes.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

As described in each section above, we partner with Local Authorities and charity organisations to deliver the Big Brothers Big Sisters Programme in local chapters around the UK. Each partner organisation take responsibility for the collection, use and security of the personal data locally to support the delivery of the programme. The data is managed through the BBBS UK Digital Platform. This BBBS UK Digital Platform has been designed and is owned by the BBBS UK Foundation; whilst we do not routinely access the individual-level record maintained by our local partners, there are limited circumstances which may require us to access this information. For example, in case of issues with the platform or if there are complaints or safeguarding concerns about the practices of the local partners which require audit or further investigation.

We may pass your information on to third party service providers, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf. However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for other purposes.

Third party service providers who act as data processors on our behalf:

Service Provider	<b>Activity Carried Out</b>	Sector	Location
Cloud storage (data processor)	Storage of documents for team access	Information Technology	EEA/USA (TBC)
IT Support Provider	Manage IT and Security	Information Technology	UK
BBBS UK Digital Platform Provider	Design, manage, host and secure the BBBS UK Digital Platform	Information Technology	UK/EEA

If any of your personal data are shared with a third party, as described above, we will take steps to ensure that your personal data are handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above.

## Transfers outside of the UK and European Economic Area

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data are treated just as safely and securely as they would be within the UK and under our Data Protection Legislation as follows:

- We share your data with external third parties, as detailed in the table above, that are based outside of the UK & EEA. The following safeguards are applied to such transfers:
  - We will only transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the Information Commissioner's Office.
  - We use specific contracts with external third parties that are approved by the Information Commissioner's Office and European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the <u>European Commission</u>.
  - o Where we transfer your data to a third party based in the US additional steps have

been taken to ensure your personal data will be treated as securely and safely as it would be in the UK and under the GDPR. We have signed Data Processing Agreements with our data processors based on model contract clauses provided by the Information Commissioner's Office and European Commission (also known as 'standard contract clauses'), which impose suitable data protection standards on a contractual basis.

Please contact us using the contact details provided below for further information about the particular data protection mechanisms used when transferring your personal data to a third country.

## What are my rights?

Under Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This
  Privacy Policy should tell you everything you need to know, but you can always contact
  us to find out more or to ask any questions using the contact details provided at the
  end of this policy.
- The right to access the personal data we hold about you. The section "How Can I Access My Personal Data?" will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us are inaccurate or incomplete. Please contact us using the contact details provided at the end of this policy.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold, in certain circumstances. Please contact us using the contact details provided at the end of this policy to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data are processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact using the contact details provided at the end of this policy.

It is important that your personal data are kept accurate and up-to-date. If any of the personal data we hold about you change, please keep us informed for as long as we have those data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first using the contact details provided at the end of this policy.

We ask for your consent to send you direct marketing information and will always provide you with the opportunity to amend your preferences or to opt-out of receiving future marketing communications from us.

## How you can update your information

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please email us at: <a href="mailto:sarah.brennan@bigbrothersbigsistersuk.org">sarah.brennan@bigbrothersbigsistersuk.org</a> or by post at: 6 Wingfield Close, Ewelme, Wallingford, OX10 6JY

## How you can access your personal information

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests can be made in writing, either via email or via the postal addresses shown below, or verbally, either in person or on the phone. We would ask that individuals whose data is managed by our local partners (e.g. Big Siblings, Little Siblings, Social Workers) that you approach our partner organisation directly with a subject access request as we do not have routine, direct access to your individual records.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data, within that time. In some cases, however, particularly if your request is more complex, more time may be required, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

You also have the right to lodge a complaint about our processing of your personal data with the UK's <u>Information Commissioner's Office</u>

## **Keeping your data secure**

The security of your personal data is essential to us, and to protect your data, we take a

number of important measures, including the following:

- Limiting access to your personal data to those individuals and third-party processors with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.
- Adhering to our policies and processes including, physical security, back-up, encryption, access control and password protocols.

#### Contacting us via email

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## **Cookie Information for Visitors to our Website**

#### What are cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

#### How do we use Cookies?

Cookies provide information about individuals' usage of the website, which may identify you as the same individual even if we do not know your name, we can identify location, IP address and device information. As such, we make sure you have a choice about the cookies that are placed on your device for our statistical purposes by Google Analytics, which help us to understand more about the ways in which people use our website. We would appreciate it if you opt-in to accept these cookies when the website asks you, as it will help us to improve it over time.

#### What Cookies do we use?

We use first-party cookies (Cookies set by Big Brothers Big Sisters UK Foundation) and third-party cookies (cookies set by other providers, e.g. analytics providers such as Google).

Cookie	Name	Purpose	More information	
Necessary Cookies: Necessary cookies help make a website usable by enabling basic functions like page				
navigation and access to secure areas of the website. The website cannot function properly without these				
cookies. No consent is required for Necessary cookies.				

To be completed					
when website live					
when website live					
Non-essential cookie	es: Non-essentia	Il cookies have a range of functions, fron	n allowing the website owner to		
understand how user	rs are moving ar	ound and using their website (Statistical	l) to third-party cookies which		
look to build a profile	look to build a profile of individuals that can inform their online marketing decisions (Marketing). Non-				
essential cookies req	uire a user to 'o	pt-in' to accept the cookie onto their de	vice.		
ga	Google	These cookies are used to collect	Click here for an overview of		
_gid	Analytics	information about how visitors use	privacy at Google.		
_gat	(Statistical)	our site. We use the information to	process as a constant		
_844	(Statistical)	compile reports and to help us			
		improve the site. The cookies collect			
		information, including IP address,			
		including the number of visitors to			
		the site, where visitors have come to			
		the site from and the pages they			
		visited.			

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <a href="www.aboutcookies.org">www.aboutcookies.org</a> or <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>. To find out more about specific cookies, who places them and their purposes, visit <a href="www.cookiedatabase.org">www.cookiedatabase.org</a>. We have used this resource to populate the table above.

#### Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

## How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of:

Data Protection Lead: Sarah Brennan

**Email address**: sarah.brennan@bigbrothersbigsistersuk.org **Postal address**: 6 Wingfield Close, Ewelme, Wallingford, OX10 6JY

## Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 28/07/2022.