

# Butterfly Hope

## Data Protection Policy

### Approval and renewal

Policy owner: Director, Grace Thompson, Butterfly Hope	Date of last review: November 2025
Policy approval: Director, Grace Thompson, Butterfly Hope	Date of next review: November 2026

Protecting your personal information with care, respect, and transparency

### 1. Our Commitment

At Butterfly Hope, we take your privacy seriously. We are committed to protecting the personal information of everyone we work with—participants, volunteers, staff, Directors, and partners. We follow UK data protection laws, including the UK GDPR and the Data Protection Act 2018.

This policy applies to all personal data we handle, whether stored digitally or on paper, and whether it relates to current or past employees/volunteers, customers/participants, website users, or any other individual.

Everyone working with us—staff, volunteers, freelancers, and Directors—must read, understand, and follow this policy. Training is provided, and compliance is mandatory. Breaches may result in disciplinary action.

### 2. What Is Personal Data?

**Personal Data** is any information that can identify someone, either directly or indirectly. This includes:

- Names, addresses, emails, phone numbers
- Dates of birth, health details, opinions or behaviours
- Sensitive data like race, religion, sexual orientation, or health (called "Special Category Data")

### 3. How We Use Your Data

We may use personal data to:

- Run programmes and events
- Communicate with you
- Keep people safe (e.g. safeguarding records)
- Improve our services

This is called **Processing**—any activity involving personal data, like collecting, storing, updating, sharing, or deleting it.

We will always:

- Use data lawfully, fairly, and transparently
- Ask for clear consent when needed
- Keep data secure and confidential
- Only share data when necessary and lawful
- Provide a **Privacy Notice** when collecting data directly or indirectly
- Only use data for the purpose it was collected (unless you're informed and give consent)

## 4. Your Rights

You have rights over your personal data. You can:

- Withdraw consent at any time
- Ask what data we hold and how we use it
- Request access to your data
- Ask us to correct or delete inaccurate or unnecessary data
- Restrict how your data is used in certain situations
- Object to direct marketing or automated decisions
- Ask for your data to be transferred to another provider
- Be informed of any data breach that affects you
- Make a complaint to the Information Commissioner's Office (ICO)

We will verify your identity before responding to any request and forward all requests to the Director immediately.

## 5. Keeping Your Data Safe

We use strong safeguards to protect your data from loss, misuse, or unauthorised access. This includes:

- Secure storage and passwords
- Limited access to sensitive data
- Staff training on data protection

- Regular reviews of our systems and policies

You must:

- Only access data needed for your role
- Avoid collecting excessive or irrelevant data
- Correct or delete inaccurate data promptly
- Follow all security procedures from collection to deletion
- Take extra care with sensitive or criminal data

If you suspect a **Personal Data Breach**, report it immediately to the Director. Do not investigate it yourself. We will notify the ICO and affected individuals if required.

## 6. Accountability and Record Keeping

Butterfly Hope is the **Controller** of your data. That means we decide how and why your data is used.

We are responsible for:

- Keeping full records of how we use personal data
- Documenting the types of data, why we use it, where it's stored, and who it's shared with
- Appointing a Data Protection Lead and providing regular training
- Reviewing and testing our privacy measures
- Ensuring everyone understands and follows this policy

## 7. Privacy by Design and DPIAs

We build privacy into everything we do. This is called **Privacy by Design**. Before starting any new project, piece or work, or system that uses personal data, we:

- Assess risks and safeguards
- Consider the cost, scope, and impact
- Complete a **Data Protection Impact Assessment (DPIA see Appendix 1)** for high-risk activities, such as:
  - o Using new or changing technologies
  - o Automated decision-making or profiling
  - o Large-scale use of sensitive or criminal data

## 8. Automated Decisions and Direct Marketing

We do not make decisions using only computers (called **Automated Decision-Making**) unless:

- You've given **Explicit Consent**
- It's required by law
- It's necessary for a contract

If we ever use automated processing or profiling, we will:

- Tell you clearly and separately from other information
- Explain how the decision is made and what it means for you
- Offer the chance to request human review or challenge the decision

We also follow strict rules for **Direct Marketing (e.g. newsletter)**:

- We only send marketing messages with your consent (or under "soft opt-in" rules)
- You can opt out at any time, and we'll stop immediately
- We keep a record of your preferences to respect your choices

## 9. Sharing Data with Others

We only share personal data when:

- It's necessary for a service or legal reason
- The recipient has a job-related need to know
- The data is protected by a contract and proper safeguards
- You've been informed or given consent (if required)

We never share data without ensuring the third party meets our security standards and UK GDPR requirements.


## 10. Final Notes

We believe in:

- **Respect**: valuing your privacy and treating your data with care
- **Honesty**: being clear about how we use your information
- **Professionalism**: following the law and best practice
- **Service to Others**: using data to support and protect our community
- **Creativity & Connection**: using data to improve our work and reach more people
- **Problem-Solving & Learning**: reviewing and improving how we handle data

- **Hope:** building a safe, inclusive future for everyone

We review this policy regularly. It does not override any national laws where we operate.

If you have questions or feedback, contact:  Grace Thompson, Director - [thebutterflyhope@gmail.com](mailto:thebutterflyhope@gmail.com)

## Linked Policies

Safeguarding

Equality, Diversity and Inclusion

## Appendix 1:

### Butterfly Hope

#### Data Protection Impact Assessment (DPIA)

*Use this form when starting a new project/event, system, or activity that involves personal data.*

#### 1. Project/Event Overview

Project name: \_\_\_\_\_

Date of assessment: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Lead contact / person responsible: \_\_\_\_\_

Team members involved: \_\_\_\_\_

Brief description of the project or activity: (What is it? What does it involve?) \_\_\_\_\_

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#### 2. Personal Data Involved

What types of personal data will be used?

- Name    Email    Address    Date of birth    Health info    Photos  
 Criminal records    Other:

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Who does the data belong to?

- Children    Young people    Adults at risk    Staff    Volunteers

Other: \_\_\_\_\_

**How will the data be collected?**

Online form    Paper form    Email    Verbal

Other: \_\_\_\_\_

**Will any sensitive data be used (e.g. health, ethnicity, religion)?**

Yes    No

If yes, explain why: \_\_\_\_\_

**3. Purpose and Legal Basis**

**Why are you collecting this data? What is the purpose?**

\_\_\_\_\_

**What is the legal reason for using this data?**

Consent    Contract    Legal obligation    Vital interests    Legitimate interests

Explain your choice: \_\_\_\_\_

**4. Risks and Safeguards**

**Could this data use cause harm or distress to anyone?**    Yes    No

If yes, explain: \_\_\_\_\_

**What steps are being taken to protect the data?**

Password protection    Limited access    Encryption    Staff training    Secure storage    Regular reviews    Other: \_\_\_\_\_

**Will the data be shared with anyone outside Butterfly Hope?**

Yes    No If yes, who and why?

\_\_\_\_\_

**Will the data be transferred outside the UK?**

Yes    No

If yes, explain safeguards in place: \_\_\_\_\_

**5. Automated Decisions or Profiling**

**Will any decisions be made using only computers or algorithms?**

Yes  No

If yes, explain how and what impact it may have: \_\_\_\_\_

**Have individuals been informed of their rights (e.g. to object or request human review)?**  Yes  No

## **6. Data Retention and Review**

**How long will the data be kept?**

**How will you review and update this DPIA?**

Annual review  After major changes  Other: \_\_\_\_\_

## **7. Final Sign-Off**

**Assessor name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

**Approved by (Director or Data Protection Lead):**

**Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_