



Privacy Policy

Last reviewed by the Trustees: December 2025

Next Review: No later than December 2026

Context

We help families overcome the costs of education so all children in Luton have the chance to love learning.

When money is tight at home, a child might not have the uniform and equipment they need for school. Over 50% of children in Luton live in poverty – that's over 25,000 children.

We help children aged 4–18 by providing gift cards for school shoes and coats, running a Uniform Exchange in The Mall, giving out Learn at Home resource packs and distributing laptops to support vulnerable children with their digital learning.

To do this well, we need to collect and use some personal information. The families, partners, supporters, staff and volunteers we work with trust us with that information, and we take that trust seriously.

1. Introduction and Who We Are

- 1.1 This policy explains how Level Trust collects, uses, stores and shares personal information, and the rights people have over their information. It applies to everyone whose data we hold, including children and young people, parents and carers, partner organisations, donors and supporters, volunteers, staff, trustees and job applicants.
- 1.2 Level Trust is the **data controller** for the personal information we process. We are a registered charity (number 1178223) based at Unit 2G The Mall, Luton LU1 2TW. Our ICO registration number is [ICO number].
- 1.3 We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the Privacy and Electronic Communications Regulations (PECR).
- 1.4 Our Data Protection Officer (DPO) is Jennie White, CEO, who can be contacted at jennie.white@leveltrust.org or by post at the address above.
- 1.5 We follow the data protection principles. Personal data will be:
 - processed lawfully, fairly and transparently;
 - collected for specific, legitimate purposes;
 - adequate, relevant and limited to what is necessary;
 - accurate and kept up to date;
 - kept no longer than necessary;
 - kept secure.

2. What Personal Data We Collect

- 2.1 We only collect the information we need. Depending on how you are involved with us, this may include:

Who	Information we may hold
Children and young people	Name, age, school, year group, clothing and shoe sizes, needs relevant to support (e.g. SEND), safeguarding records
Parents and carers	Name, address, phone, email, household circumstances relevant to eligibility, referral details, permission forms
Referring partners (schools, agencies)	Contact names, job titles, work contact details, referral information
Donors and supporters	Name, contact details, donation history, Gift Aid declarations, communication preferences
Volunteers	Contact details, emergency contacts, references, DBS outcomes, training records, availability
Staff and trustees	Contact details, employment records, bank details for payroll, references, DBS outcomes, training and supervision records
Job applicants	Application forms, CVs, interview notes, references, right-to-work checks
Website and social media users	Cookie data, IP address, enquiries and messages you send us

2.2 **Special category data.** Sometimes we hold more sensitive information, such as health, disability, ethnicity or religious belief. We only do this where it is needed to support a child or family, to meet our legal duties, or for equal opportunities monitoring, and with the safeguards in section 5.

2.3 **Criminal offence data.** We hold DBS check outcomes for staff, volunteers and trustees as part of Safer Recruitment. These are handled in line with our Safeguarding Policy and DBS guidance.

3. How We Collect Personal Data

3.1 We collect information:

- directly from you, for example when you visit the Uniform Exchange, apply for support, make a donation, volunteer or apply for a job;
- from referring partners, such as schools, health visitors, social care and other organisations within our network of 190+ partners, usually with your knowledge;
- from referees and the Disclosure and Barring Service during recruitment;
- through our website, online forms and social media channels.

3.2 Where someone else gives us your information, we will make sure you are told about it, unless doing so would put a child or adult at risk.

4. How We Use Personal Data and Our Lawful Basis

4.1 We must have a lawful basis for every use of personal data. The main ones we rely on are:

Purpose	Lawful basis
Providing support to children and families (uniform, gift cards, Learn @ Home packs, laptops)	Legitimate interests; consent where appropriate

Purpose	Lawful basis
Keeping children safe and making safeguarding referrals	Legal obligation; vital interests; public task
Processing donations and claiming Gift Aid	Contract; legal obligation (HMRC)
Sending newsletters and fundraising appeals by email or text	Consent
Sending fundraising information by post	Legitimate interests
Recruiting and managing staff, volunteers and trustees	Contract; legal obligation; legitimate interests
Reporting to funders and measuring our impact	Legitimate interests (anonymised wherever possible)
Taking photos or case studies for publicity	Consent

- 4.2 Where we rely on **legitimate interests**, we have balanced our interests against your rights and are satisfied the processing is fair and expected. You can ask us for details of this assessment.
- 4.3 Where we rely on **consent**, you can withdraw it at any time by contacting us. This will not affect anything we did before you withdrew it.
- 4.4 We will never sell your data or share it with other organisations for their marketing.

5. Children's Data and Special Category Data

- 5.1 Children's information deserves extra protection. We collect only what we need to provide support, and usually through a parent, carer or referring school.
- 5.2 Children aged 13 and over may consent to some online services themselves. For younger children, we ask a parent or carer, including through the Parent/Carer Permission Form used for our projects.
- 5.3 We approach every family with dignity. We understand that financial hardship can carry stigma, so information about a family's circumstances is seen only by those who need it.
- 5.4 Special category data is processed only where a condition under Article 9 of UK GDPR and Schedule 1 of the Data Protection Act 2018 applies, most often safeguarding of children and individuals at risk, substantial public interest, or explicit consent.
- 5.5 **Safeguarding comes first.** We may share information without consent where we believe a child or adult is at risk of significant harm. This is done in line with our Safeguarding Policy, the Luton Safeguarding Children Partnership procedures and *Working Together to Safeguard Children*. Data protection law does not prevent us from sharing information to keep someone safe.
- 5.6 Because Level Trust is a safe space for people experiencing domestic abuse, we take particular care never to disclose a person's address or contact details where this could place them at risk.

6. Sharing, Security and Retention

Who we share data with

- 6.1 We may share personal data with:
- schools and referring partners, where needed to provide or follow up support;
 - Luton MASH, children's social care, the police or the LADO, for safeguarding purposes;

- HMRC, for Gift Aid claims;
 - the Disclosure and Barring Service, for recruitment checks;
 - trusted service providers who process data on our behalf (for example IT, payroll, email and fundraising platforms), under written contracts that require them to keep it secure;
 - regulators such as the Charity Commission and the ICO, where required by law.
- 6.2 Reports to funders use anonymised or aggregated information. We will only use a family's story or photograph with their consent.
- 6.3 If any data is transferred outside the UK, we make sure appropriate safeguards are in place, such as UK adequacy regulations or approved contract clauses.

Keeping data secure

- 6.4 We use appropriate technical and organisational measures to protect personal data, including:
- password-protected and encrypted devices, with multi-factor authentication where available;
 - access limited to staff and volunteers who need it;
 - secure storage of safeguarding records in our recording system, separate from general records;
 - locked storage for any paper records;
 - data protection and cyber security training for staff and volunteers;
 - regular review of filtering, monitoring and IT security.
- 6.5 Laptops distributed to children are wiped of all previous data before reuse or donation.
- 6.6 **Data breaches.** Any suspected breach must be reported to the DPO immediately. Where a breach is likely to put people at risk, we will report it to the ICO within 72 hours and tell the people affected without delay. All breaches are logged and reviewed.

How long we keep data

- 6.7 We keep data only as long as we need it, in line with our Data Retention Schedule. As a guide:

Type of record	Retention period
Family support records	3 years after last contact
Safeguarding records	Until the child's 25th birthday, or longer if advised by the local authority or required by an inquiry
Donation and Gift Aid records	6 years after the end of the financial year
Staff and volunteer records	6 years after they leave
Unsuccessful job applications	6 months after the recruitment decision
Allegations against staff or volunteers	Until normal retirement age or 10 years, whichever is longer
Marketing preferences	Until consent is withdrawn; a suppression record is kept so we do not contact you again

- 6.8 When records are no longer needed, they are securely deleted or shredded.

7. Your Rights, Cookies, Contact and Complaints

Your rights

- 7.1 You have the right to:

- **access** the personal data we hold about you (a Subject Access Request);
 - ask us to **correct** inaccurate or incomplete information;
 - ask us to **delete** your information, where we have no lawful reason to keep it;
 - ask us to **restrict** how we use your information;
 - **object** to our use of your information, including for direct marketing at any time;
 - **data portability**, where processing is based on consent or contract;
 - **withdraw consent** at any time, where we rely on consent.
- 7.2 Parents and carers can usually make requests on behalf of younger children. Where a child is old enough to understand their rights, we will consider their views. We may refuse a request if sharing information would put a child or anyone else at risk.
- 7.3 We will respond within one calendar month. This can be extended by two months for complex requests, and we will tell you if so. There is normally no charge.

Cookies and our website

- 7.4 Our website (www.leveltrust.org) uses cookies to make it work and to understand how visitors use it. Non-essential cookies are only set with your consent, which you can change at any time through the cookie banner. Our website may link to other sites; we are not responsible for their privacy practices.

Contact and complaints

- 7.5 To make a request or raise a concern, please contact our Data Protection Officer:

Jennie White, CEO and DPO

Level Trust, Unit 2G Luton Fraser Point, Luton LU1 2TW

jennie.white@leveltrust.org

- 7.6 If you are unhappy with how we have handled your information, please tell us first so we can put things right. You also have the right to complain to the Information Commissioner's Office (ICO): www.ico.org.uk, 0303 123 1113, or Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Related policies and review

- 7.7 This policy should be read alongside our Safeguarding Policy, Data Retention Schedule, Data Breach Procedure and IT and Acceptable Use Policy.
- 7.8 The Trustees will review this policy annually, or sooner if the law or our work changes. The latest version is always available on our website and on request.