

## PRIVACY POLICIES

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### APPENDICES

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**Data Protection Procedures**

#### 1. Purpose of the Policy

This policy sets out the data protection policies and procedures of the St Giles & St George Education Charity<sup>1</sup> and the Alms Charity<sup>2</sup>, together the “Charities”. It explains why each of the Education and Alms Charities collects data from you or that you provide to them, and how the respective Charity will use it. Please read it carefully to understand how each Charity will treat your personal data and your rights.

<sup>1</sup> St Giles in the Fields and William Shelton Education Charity (Charity Number: 1111907)

<sup>2</sup> St Giles in the Fields and Bloomsbury United Charity (Charity Number: 1111908)

The Trustees of each Charity take your privacy seriously and are committed to protecting your personal information.

Each Charity is a data controller which means it is responsible for how it collects and uses personal information about you during and after your working relationship with it, in accordance with the General Data Protection Regulation (GDPR) 2018.

The relevant parts of this policy applies to all personal information that each Charity collects and processes relating to identifiable, living individuals. For both Charities, it applies to all current and former employees, workers and contractors, volunteers, trustees, grant beneficiaries and partner organisations and, for the Alms Charity, it also applies to almshouse residents. It is also relevant to anyone who has applied for (but not been selected) any of these roles or services.

The Clerk to the Trustees is the nominated person for data protection for both charities.

Both the Alms Charity and Education Charity are registered as a data controller under the GDPR with the Information Commissioner's Office.

## **2. Data protection principles**

Both charities will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

- a) used lawfully, fairly and in a transparent way;
- b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- c) limited to what is necessary for that purpose;
- d) accurate and up to date;
- e) kept only as long as necessary for the purposes we told you about;
- f) kept securely.

## **3. What information do we collect?**

Both charities may collect, store and use a variety of categories of personal information about you. This may include your name, contact details, date of birth, financial information, bank details.

We may also collect, store and use 'special categories' of more sensitive personal information.

A full explanation of the information collected for each different activity of the charities is detailed in each Information Audit in the Appendices to this policy.

#### **4. How do we collect information?**

Both charities mostly obtain personal information that individuals provide about themselves, when you:

- use our website
- sign up to mailing lists
- submit an application form (electronically or in hard copy)
- make an enquiry via email or telephone
- or otherwise provide us with personal information.

There are situations where both charities may collect additional information, for instance:

- Researching information in the public domain, ie newspaper or online media items, publicly available posts on Linked In or social media or Charity Commission and Companies House listings.
- Requesting information from third party organisations (such as employment agencies, background check provider, and referees) during selection processes for employees, Directors and Almshouse residents. We will inform you (and sometimes get your consent) for any checks that we are carrying out.
- Finding out additional information in the course of job-related activities throughout the period of you working/volunteering/being accommodation/accessing services with us.
- Technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet.

Each Charity also gathers general information about the use of our joint website, such as which pages users visit most often, and which services/activities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users. Wherever possible, we use aggregated or anonymous information which does not identify individual visitors to our website.

#### **5. How do we use this information?**

Each Charity may use your personal information:

- To process your application for a grant
- To process your application as an employee/trustee/worker/volunteer
- To provide you with services or information you have requested
- To keep in touch with grant recipients and inform them of any changes to our grants scheme or any events we are holding
- To keep in touch with partner and referral organisation, to send you information about our work, invitation to our events and regular newsletters
- To meet our legal requirements as an employer

- To meet our legal requirements as registered charities and companies limited by guarantee
- To personalise your future visits to our website and to improve the experience we provide to our online users.

Additionally, the Alms Charity may use your personal information:

- To process your application to become a St Giles Almshouse resident
- To provide support and assistance to St Giles Almshouse residents
- To maintain the St Giles Almshouses properties

For more detailed information, please refer to the specific Information Audits for each service/activity contained in the Appendices.

## **6. Do we share your information with anyone else?**

Neither Charities will sell your information to any third party.

Your information may be disclosed to third parties who provide the charities with services to store data, and act as processors on behalf of the charities, eg:

- Online grant applications forms (Formstack)
- Grants management system (Salesforce)
- Mailing list (Mailchimp)
- Cloud data storage (Office 365)

For the Alms Charity, your information may be disclosed to third parties who provide services on our behalf, to the extent necessary to enable you to receive those service, eg:

- Almshouse telecare service
- Almshouse maintenance contractors
- Suppliers of appliances and furniture to grant recipients

We have contracts in place with all third-party suppliers to ensure that they are obligated to treat our customers' personal data in compliance with General Data Protection Regulation 2018.

In certain circumstances, the charities may be required to disclose personal data to third parties when required by law, when necessary to protect the charities' legal rights, or in an emergency situation where the health or security of an individual is endangered.

For more detailed information, please refer to the specific Information Audits for each service/activity contained in the Appendices.

## **7. How long do we keep your information?**

Neither Charities will keep your information for longer than necessary. We will retain your information for any period required by law, for example, financial records are stored for seven years in compliance with HMRC requirements. Where we are not under a legal obligation to retain your information, we will determine what is necessary for our legitimate interests. Both charities maintain an archive for historical purposes.

When either charity dispose of personal data, this will be done in a secure manner. Paper-based documents will be shredded on site. Electronic data will be permanently deleted from all drives and electronic media.

For more detailed information, please refer to the specific Information Audits for each service/activity contained in the Appendices.

## **8. How do we protect your personal information?**

Both charities take necessary technical and organisational security measures to prevent the unauthorised or unlawful processing or disclosure of personal data, and the accidental loss, destruction of, or damage to personal data.

You should be aware that the use of the Internet is not entirely secure and although we do our best to protect your personal data, we cannot guarantee the security or integrity of any personal information which is transferred from you or to you over the Internet. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

## **9. Your Rights**

Data protection regulations give you clear rights over how your data is used by us. You can find out more details about your rights by visiting the Information Commissioner's Officer website section on individual rights. In summary, you have the right to:

- Request a copy of the information that we hold about you (access)
- Ask us to correct information that you think is inaccurate (rectification)
- Ask for your data to be deleted (erasure), although this is not absolute.
- Ask us to restrict our usage of your data (restriction), although this is complicated.

If you would like to exercise any of your rights above, please contact the Clerk to the Trustees by:

Email: [clerk@stgilesandstgeorge.org.uk](mailto:clerk@stgilesandstgeorge.org.uk)  
Post: 60 St Giles High Street, London, WC2H 8LG

We will act in accordance with your instructions as soon as reasonably possible and you will not be charged.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline on 0303 123 1113.

## **10. Cookies**

The use of cookies is common practice on modern websites. A cookie is a small text file which is placed on your computer's hard drive by a website. When you visit our website, your browser checks to see if it has any cookies for it and sends the information contained in these cookies back to the site in order to tailor and improve your experience.

We also use third-party cookies to track how our websites are used. For example, we use Google Analytics cookies to collect anonymous usage and visitor behaviour information – this includes IP addresses, operating system, browser type, pages visited, and links you click on.

## **11. Changes to this policy**

Both charities keep the Privacy Policy under regular review and will place any updates on this web page.

**This privacy policy was updated on 18 February 2020.**

**INFORMATION AUDIT – St Giles Almshouse Waiting List**

This Information Audit applies specifically to the Alms Charity. Please note that we keep basic information about applicants beyond the retention period for historical records and reports.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Expression of Interest Form</b>						
Full Name Address Telephone Email	To contact applicant to inform them of potential vacancies & ask if they would like to remain on the waiting list.	Necessary for the legitimate interests of the organisation.	Impact on data subjects' rights & freedoms is very low. Processing is in data subjects' interest.	None	All paper records are scanned & shredded. Electronic files & emails are stored on Office 365.	Updated annually & data deleted if no longer needed. We keep a basic record (initials & postcode).
Date of Birth Age Gender Marital Status	To check eligibility as we can only accept women over 60.	As above	As above	None	As above	As above
Financial Information Connection to Area	To check eligibility in accordance with our constitution.	As above	As above	None	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Application Form</b>						
Full Name Address Telephone Email	To contact applicant to let them know outcome of their application & to arrange an interview, if needed.	Necessary for the legitimate interests of the organisation.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Trustees	All paper records are scanned & shredded. Electronic files & emails are stored on Office 365.	Updated annually & data deleted if no longer needed. We keep a basic record (initials & postcode).
Date of Birth Age Gender Marital Status	To check eligibility as we can only accept women over 60.	As above	As above	Trustees	As above	As above
Employment history Connection to local area Present accommodation Detailed Financial Info – income, expenditure, capital & debt	To assess your current circumstances & determine your priority for a vacancy.	As above	As above	Trustees	As above	Data is deleted 12 months after the selection process is complete. If there is a new vacancy, then you will have to complete a new application form.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Health & social issues	To assess your current circumstances & determine your priority for a vacancy. To ensure that you are able to live independently.	As above  Also ask	As above	Trustees	As above	As above
Convictions	To assess character of applicant	As above	As above	Trustees	As above	As above
Nationality Immigration status	To determine your 'Right to Rent'.	As above	As above	Trustees	As above	As above
Notes of conversations during selection interviews	To assess your current circumstances & determine your priority for a vacancy.	As above	As above	Trustees	As above	As above

**INFORMATION AUDIT – St Giles Almshouse Resident**

This Information Audit applies specifically to the Alms Charity.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Appointment Form</b>						
Full Name Address Telephone Email	To contact resident about Almshouse. To undertake maintenance at the property. To provide support & assistance. To provide TV licence.	Necessary for the legitimate interests of the organisation.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Harrison Housing & their contractors. Other maintenance contractors. Camden Careline. TV Licence Authority. Anyone else who may need to make an appointment.	All paper records are scanned & shredded. Electronic files & emails are stored on Office 365.	Retained for as long as they are resident, & for two years after this ceases. Financial records are kept for 7 years.  Names & dates of appt are retained for historical record. Any sensitive data is deleted.
Date of Birth Age Gender Marital Status	To check eligibility as we can only accept women over 60.	As above	As above	TV Licence Authority	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Employment history Connection to local area Present accommodation	To assess your current circumstances & determine your priority for a vacancy.	As above	As above	Trustees	As above	As above
Financial Info – income, expenditure, capital & debt	To check your continuing eligibility.	As above	As above	Trustees	As above	The original form is kept as above. This information is updated every 1–2 years to check eligibility.
Disability	To ensure that you are able to live independently. To be able to respond appropriately to any arising health issues.	As above	As above	Trustees. TV Licence Authority.	As above	Retained for as long as they are resident, & for two years after this ceases.
Health & social issues	To ensure that you are able to live independently. To be able to respond appropriately to any arising health issues.	As above  Also ask for consent	As above	Trustees. Camden Careline.	As above	The original form is kept as above. This information is updated every 1–2 years to check eligibility.
Convictions	To assess character of applicant	As above	As above	As above	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Nationality Immigration status	To determine your 'Right to Rent'.	As above	As above	Trustees	As above	Retained for as long as they are resident, & for two years after this ceases. Financial records are kept for 7 years.
Notes of conversations during selection interviews	To assess your current circumstances & determine your priority for a vacancy.	As above	As above	Trustees	As above	As above
<b>Appointment Form</b>						
NHS Number GP practice GP name GP address	To contact GP to request a medical reference prior to full appointment. With permission, to contact GP if resident has a medical need/emergency.	Necessary for the legitimate interests of the organisation.  Ask for consent.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Trustees. Camden Careline.	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Reference contact details Referee responses	To ask for a character reference prior to appointment as a resident.	Necessary for the legitimate interests of the organisation.	As above	None	As above	As above
National Insurance Number	To apply for ARC concessionary TV Licences.	As above	As above	TV Licence Authority	As above	As above
Emergency contact	To contact someone about your residence at the Almshouse, particularly in an emergency.	As above	As above	None	As above	As above – updated every 1-2 years
Next of Kin	To contact someone about your residence at the Almshouse, particularly in an emergency.	As above	As above	None	As above	As above – updated every 1-2 years
Information about Will, Powers of Attorney, & funeral plan	To know what is/is not in place should a resident pass away, as some have few family members to help.	As above	As above	None	As above	As above – updated every 1-2 years

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Other Information</b>						
Letter of Appointment	To have a formal agreement with the resident.	As above Contract	As above	Trustees	As above	As above
Dietary requirements	To provide suitable food at Summer Tea party & at Christmas Meal.	As above	As above	Catering suppliers/ restaurants.	As above	As above
MMC records including Housing Benefit letters & records	To ensure that Monthly Maintenance Contribution is paid in full each month.	As above	As above	Name & financial records are shared with Independent Examiners.	As above	As above
Bank details	To repay any MMC overpayments.	As above	As above	Bank	Stored in online banking system.	As above

**INFORMATION AUDIT – Directors**

This Information Audit applies to both the Alms and Education charities. As two small charities, we often use local networks or online networks to advertise and recruit new Directors. We do not have a standard application form and monitoring form but ask anyone who is interested in the role to send a CV and covering letter, in accordance with our Director recruitment and selection policy.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Application Process</b>						
Full Name Address Telephone Email	To contact them about their application to become a Director & arrange interviews etc.	Necessary for the legitimate interests of the organisation.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Directors	Electronic files & emails are stored on Office 365.	Applications will be retained until 6 months after a new Director has been appointed, then they will be securely deleted.  We do keep a summary of all recruitment exercises including names, dates & advertisement methods but not address or CVs.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Employment history Education Training Other skills & interests	To assess your application to select a new Director.	As above	As above	Directors	As above	As above
Age Date of Birth Ethnicity Nationality	We do not use a diversity questionnaire for potential applicants, but this information is sometimes provided.	As above	As above	None	As above	As above
Interview notes & scoring sheets	To assess your application to select a new Director.	As above	As above	Directors	As above	As above
Reference contact details Referee responses	To ask for a character/work reference prior to appointment as a resident.	Necessary for the legitimate interests of the organisation.	As above	None	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Appointed Directors</b>						
Full Name Address (previous address) Telephone Email	To check that they are not disqualified from becoming a Director. To appoint them as Director. To send them information regarding the charity's business. To complete "Know your Client" info.	Necessary for the legitimate interests of the organisation. Legal Obligations – anti money laundering regulations.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Directors. Companies House. Banks. Accountants. Investment Managements. Solicitors.	Electronic files for each Director is stored on Office 365.	Companies House require us to keep records of Directorships in perpetuity (as they do). Related party forms are part of financial records & should be kept for 7 years. Where possible, the charity will minimise the information being kept – remove individual file & delete from contacts etc.
Date of Birth Occupation Nationality Town of Birth Country of Birth Nationality Tax Residency	To appoint them as a Director. To complete "Know your client" info.	As above	As above	Companies House	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Trustee declaration	To ensure that you are not disqualified from becoming a Director.	Legal Obligation – charity law.	As above	None	As above	As above
Information about other Directorships/ trusteeships	To create a Register of Interests & identify & manage & conflicts of interest.	Legitimate Interests.  Legal Obligation – SORP.	As above	Directors. Accountants.	As above	Updated annually as part of independent examination.  Otherwise as above.
Information about Directorships/ Trusteeships of near family members	To create a Register of Interests, & identify & manage any conflicts of interest.	As above	As above	Directors. Accountants.	As above	As above
Bank details	To reimburse any expenses.	As above	As above	Bank	Stored in online banking system.	As above

**INFORMATION AUDIT – Individual Grant**

This Information Audit applies primarily to the Alms Charity but the Education Charity has occasionally made individual grants. The application form is shared with St Andrew’s Holborn as we contract with them to undertake grant assessments on our behalf. A summary of each application is shared with sub-committee of Trustees to enable them to make a decision about whether to award a grant. A quarterly report is shared with Trustees, summarising the number of grants awarded, the amount awarded and paid, and what the grant was for. Both of the latter reports use initials rather than full names, but are not totally anonymous.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects’ interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Application Form</b>						
Full Name Address (previous address) Telephone Email	To contact applicant about their application. To arrange delivery of new appliances or furniture.	Necessary for the legitimate interests of the organisation.	Impact on data subjects’ rights & freedoms is very low.  Processing is in data subjects’ interest.	St Andrew’s Holborn – who undertake grants assessment. C Supplies or another supplier.	All paper records are scanned & shredded. Electronic files & emails are stored on Office 365.	The grant report & offer letter will be kept for 7 years as they are financial records. The detailed information in the application for will be deleted after 2 years. A record of grants awarded is kept to monitor future applications in line with grants policy.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Speak English?	To understand whether a face to face meeting is possible, or if assistance/interpreter is needed.	As above	As above	St Andrew's Holborn	As above	As above
Date of Birth Nationality Status Employment status	To determine your eligibility for benefits. To understand your household situation & assess application for grant.	As above	As above	St Andrew's Holborn	As above	As above
Children – age, name & school	To determine your eligibility for benefits. To understand your household situation & assess application for grant.	As above	As above	St Andrew's Holborn	As above	As above
Other people living at the address	To determine your eligibility for benefits. To understand your household situation & assess application for grant.	As above	As above	St Andrew's Holborn	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Financial Info – income, expenditure, savings & debt	To understand your household situation & assess your application for grant. To determine your eligibility for subsidised schemes.	As above	As above	St Andrew's Holborn. C Supplies/ subsidised schemes.	As above	As above
Reason for application & grant request	To understand your household situation & assess your application for grant.	As above	As above	St Andrew's Holborn	As above	As above
Previous grant	To understand your household situation & assess your application for grant.	As above	As above	St Andrew's Holborn	As above	As above
Application to other charities	To understand your household situation & assess your application for grant.	As above	As above	St Andrew's Holborn	As above	As above
Third party information	To contact them about the application, if necessary.	As above Also ask for consent.	As above	St Andrew's Holborn	As above	As above
Energy Supplier	To determine eligibility for subsidised scheme.	As above	As above	C Supplies/HEART Scheme	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Grant Awarded – amount & what for	To keep appropriate records of grant making. To monitor future applications in line with grants policy.	As above	As above	Trustees	As above	A record of grants awarded will be kept in perpetuity, although this includes minimal information.

**INFORMATION AUDIT – Organisation Grants (Alms and Education charities)**

This Information Audit applies to the Alms and Education charities. Both charities use an online application form for organisational grants but the majority of information is about the organisation rather than personal information.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<u>Main Contact</u> Full Name Job Title Telephone Email	To contact them in relation to their grant (assessment, monitoring, management etc).  To email them information about grants scheme & invite to relevant events.	Necessary for the legitimate interests of the organisation.  Consent.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Directors	Formstack as initial online form software. Salesforce as grants management software. Mailchimp for newsletter contacts. Office 365 Outlook.	Retained whilst they are a grant recipient & for 1 year after the grant ends. If they leave role then info will be deleted immediately.  Newsletter – retain unless leave role or request unsubscribe.
<u>Multi-year grants applications</u> – delivery contact name & title	To assess their skills & experience to undertake the role identified within the project.  To email them information about grants scheme & invite to relevant events.	As above	As above	None	As above	Retained whilst the organisation is a grant recipient and for 1 year after the grant ends. This information will be removed from the application.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<u>Schools/ partner info</u> – Full name & contact details of school liaison	To contact them to confirm school/partner participation in the project.  To email them information about grants scheme & invite to relevant events.	As above	As above	None	As above	As above

**INFORMATION AUDIT – Employees**

This Information Audit applies to the Education charity. The charities use an application form and diversity monitoring form for staff recruitment, in accordance with their selection policy. As the larger charity, it acts as the legal employer (on behalf of both charities). The charities have agreed a Memorandum of Understanding to explain how the resource and costs are shared.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Application Process</b>						
Full Name Address Telephone Email	To contact them about their application to become an employee & arrange interviews etc.	Necessary for the legitimate interests of the organisation.	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Directors	Electronic files & emails are stored on Office 365.	Applications will be retained until 6 months after the employee has been appointed, then they will be securely deleted.  We do keep a summary of all recruitment exercises including names, dates & advertisement methods but not address or CVs.

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Employment history Education Training Other skills & interests	To assess your application to select a suitable employee.	As above	As above	Directors	As above	As above
Ethnicity Religion Sexuality Disability	We use a diversity questionnaire for potential applicants, but this information is anonymised and the form destroyed.	As above	As above	None	As above	As above
Interview notes & scoring sheets	To assess your application to select a suitable employee.	As above	As above	Directors	As above	As above
Reference contact details Referee responses	To ask for a character/work reference prior to appointment as an employee.	As above	As above	None	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
<b>Appointed Employees</b>						
Full Name Address (previous address) Telephone Email	To appoint them as employee. To communicate Human Resource issues with them. To add them to payroll.	Employment contract	Impact on data subjects' rights & freedoms is very low.  Processing is in data subjects' interest.	Directors. Payroll provider. HMRC.	Electronic files for each employee is stored on Office 365.	Employment records will be destroyed 6 years after the person ceases to be an employee.
Disability/ heath information	To make any reasonable adaption in the workplace.	Legal Obligation - DDA	As above	No	As above	As above
Nationality Immigration Status	To ensure that the individual has the 'Right to Work'.	Legal Obligation	As above	No	As above	As above
Gender Marital Status Date of Birth NI number Tax Code Passport Number Trade Union membership	To provide PAYE information to HMRC.	Legal Obligation	As above	Payroll provider. HMRC. Pension provider.	As above	As above

<b>Information gathered &amp; retained</b>	<b>Purpose of processing</b>	<b>Legal basis for processing</b>	<b>Assessment of data subjects' interests</b>	<b>Shared with anyone</b>	<b>Storage of Data</b>	<b>Duration of retention</b>
Bank details	To provide PAYE information to HMRC. To reimburse any expenses.	As above	As above	Payroll provider.  Bank.	As above plus stored in online banking system.	As above
Absence record Appraisal/ performance information – notes and conversations Training records	To undertake standard staff performance management.	Contract	As above	None	As above	As above
Accident record	To maintain a record of any health and safety incidents at work.	Legal Obligation - Health and Safety	As above	Directors. Accountants.	As above	As above.
Emergency contact	To be able to contact someone in the event of an emergency.	Legitimate interest of organisation	As above	No	As above	As above

The most senior staff member is expected by Directors to become an authorised signatory on behalf of the charities. Therefore, their personal information would be shared with accountants, banks, and solicitors. They would also be expected to submit a related party transaction form. Please see the Information Schedule for Directors.

## **DATA PROTECTION PROCEDURES**

### **1. Subject Access Requests**

Any individual who wants to exercise their right to receive a copy of their personal data can do so by making a Subject Access Request, ('SAR') to the Clerk to the Trustees. The request must be made in writing, and the individual must satisfy the clerk of their identity before receiving access to any information.

A SAR must be answered within 40 calendar days of receipt by the charity but we will endeavour to meet any request within 10 working days.

### **2. Staff/ Director Induction**

All new staff member or Directors will be briefed on Data Protection responsibilities. They will be provided with a copy of the charities' Privacy Policy.

All Directors, staff, freelancers and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their roles.

Significant breaches of these policies will be handled under disciplinary procedures.

### **3. Annual Review of Data Protection**

On behalf of the Directors, the Clerk to the Trustees will undertake an annual review of data protection including:

- maintain an audit of the personal data that is held and where it is located;
- review the Legitimate Interests Assessment;
- review the Privacy Policy;
- review the Privacy Notices in the relevant forms;
- ensure that Data Protection training has/is taking place;
- destroy personal data when it no longer needs to be processed;
- report to the Trustees, particularly any actions that need to be taken.

### **4. Responding to data breaches**

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

If either of the charities experience a data breach, they will follow these four steps:

Step 1 – Identify the scale of the problem – what data is involved.

Step 2 – Keep a record of all personal data breaches.

Step 3 – Assess whether this poses a risk to people. We will consider the likelihood and severity of the risk to people’s rights and freedoms, following the breach. If it is likely there will be a risk, then we will notify the ICO. If it is unlikely, then we will not report. We will use the ICO self-assessment tool.

Step 4 – Report the breach:

- If the breach is serious, then we will report to the ICO within 72 hours.
- If the breach is serious, then we will inform the affected individual.
- All breaches will be reported to the Directors.