### S. Y. Killingley Memorial Trust

# Privacy and Data Protection Policy

In this statement of our policy, "we" refers to the Trustees, and where appropriate to the Selectors who help us interview applicants. "You" refers to anyone we keep information about—applicants, and also donors who contribute money to support our work.

# 1. What we hold your data for

We keep data about people to enable us to achieve the Trust's charitable objects, defined in our Trust Deed as "the advancement of education in the arts and humanities by the encouragement and support of adults who wish to continue with their education."

The information we hold is mainly provided by you. It will be revealed to you if you ask to see it, and corrected at your request. As our beneficiaries are all adults, we do not hold data on children, except insofar as you tell us about your own children. If sensitive information arises, or if we consider that you may be vulnerable or in a vulnerable situation such as an abusive relationship, we do not record this, or alert any other body, without discussing it with you.

### 2. What data we hold

We hold the personal data which you provide on our paper application form, to enable us to consider your suitability for a grant. These data are your name, postal address, email address, phone number(s), date of birth, education level, employment status, and any disability that affects your capacity to study or attend a course.

The form also asks about the course proposed, your reasons for wanting to take the course, how you think it will benefit you and others, and how you may be able to help the Trust in future. The form asks for the name, postal address, email address and phone number of someone who will write a letter of support for you, and how the writer of this letter is connected to you.

We may make notes during interviews, either on copies of the application forms or separately. These notes are not shared except among the Trustees. We may keep them for three years from the time the application is received, or the duration of your course of study, whichever is the longer.

We hold the names, postal addresses, email addresses and phone numbers (if you or they have provided them) of those who have written your letters of support, and the names, postal addresses and email addresses of donors to the Trust, if they have provided them (§ 7).

### 3. How we handle your data

The data you provide, on your application form and at interview, and in letters of support from referees chosen by you, to help us decide on a grant. We keep the data for three years from the time we receive your application, or the duration of your course, whichever is the longer, in case you apply for a further grant. After that, we keep details of the course, the amount of the grant (or, as the case may be, the refusal of a grant), and relevant circumstances, but without your name (§ 8).

If you receive a grant, one of us becomes your mentor to facilitate and encourage your study. Information you give to your mentor is confidential, but you may consent to its being shared with the other Trustees.

We also ask you whether you consent to being included in a permanent email list (§ 7).

### 4. Who sees the data we hold

We only share information about you on the basis of need to know.

Your completed application form and letter(s) of support are available only to the Applications Manager (the Trustee you send your form to) and to those Trustees and Selectors, usually three or four, who interview you. After your interview, if we give you a grant, copies of the application form, letter(s) of support, and any other documents associated with the application are retained by the Applications Manager and your mentor for three years from the time we received your application, or the duration of the course, whichever is the longer. We may keep a third copy as a backup, for the same period. Unsuccessful applications are retained for six months. Any other copies, both paper and electronic, are destroyed at the first opportunity after the interview. We do not share personal data with any other person or body, unless by your express consent, or as required by law.

If your application or grant is mentioned in any report, minute or other document other than the application form and letter of support, you are identified only by a code consisting of your given name and the last two digits of your year of birth (if your given name is very distinctive, we use a common name instead).

### 5. How we record and transmit your data

Completed application forms are received by the Applications Manager. They are scanned, and either printed and handed or posted, or emailed as attachments, to those Trustees and Selectors (usually three or four) who are involved in interviewing you.

Your email messages may be retained in the computers of the Applications Manager, your mentor, and the Data Manager for three years from the time we receive your application, or the duration of your course, whichever is the longer.

As the Trust has no office and no employees, all electronic and paper records are stored in the homes of those Trustees who are authorised by this Policy to hold them. Each Trustee who holds such records is responsible for ensuring that they are not retained longer than as authorised by this Policy, and are not available to anyone other than the Trustees or Selectors, except as required by law.

#### 6. The Trust's website

The website exists to provide information to potential applicants, donors or anyone else interested in the Trust. It also acts as a mailbox to receive messages from any member of the public. We answer such messages by email and not through the website.

Under the heading "People the Trust has helped," the website shows pictures of some grantees, with their first names and their own brief accounts of their experience of the Trust. These are only published with their consent, which may be given for a maximum of five years, after which the material is deleted unless they give further consent. They may also withdraw consent at any time, upon which the material is deleted.

The website is hosted by Wordpress, which uses cookies and other data collection tools which are outside the control of the Trust.

### 7. The Trust's email lists

The Trust maintains a set of email lists, comprising those grantees who have consented to be included, donors, and others who have expressed an interest in the Trust. We use these lists to

send reports or announcements of our activities. Those on the lists will not receive each other's names or email addresses, and may be deleted from the lists at any time if they so request. We do not share these lists with anyone other than the Trustees, except as required by law.

### 8. Our Archives

We keep an archive of our decisions, with the applicants identified only by a code (§ 4), to enable us to be aware of our previous decisions and the grounds for them. We also keep an archive of work that grantees have written as part of a course in which the Trust has supported them, and voluntarily given to the Trust.

# 9. Data Manager

The Data Manager is the Chair of the Trust, unless this role has been delegated to another Trustee. If we discover a breach of security that affects anyone's rights and freedoms, the Data Manager must notify the Information Commissioner's Office within 72 hours.

# 10. Explanation of terms

An "applicant" is any adult who applies or has applied to the Trust for a grant.

- The "Applications Manager" is one of the Trustees who receives applications, arranges interviews, and keeps the archive of application forms and associated correspondence.
- "Consent" means informed consent, which you have given freely and explicitly, and not as a condition of any decision by the Trust, and recorded on paper or electronically in a way which can be verified as your deliberate act.
- The "Data Manager" is one of the Trustees (currently and by default the Chair) who is responsible for ensuring that the Trust's management of data conforms with the General Data Protection Regulations.
- A "donor" is any person or corporate body which has given money or other assets to the Trust.
- A "grantee" is any adult who receives or has received a grant from the Trust.
- A "mentor" is a Trustee or Selector who has undertaken, with your consent, to keep in touch with you. Normally the mentor has taken part in your interview, and is appointed on that occasion.
- A "Selector" is a volunteer who is not one of the Trustees but has undertaken to assist the Trustees in interviewing applicants and awarding grants.
- "The Trust" or "We" refers to the S. Y. Killingley Memorial Trust (Registered Charity No. 1111891), established by a Trust Deed dated 5th July 2005.
- A "Trustee" is any one of up to eight volunteers, as provided by the Trust Deed, who are responsible for the management of the Trust.