**Peter Harrison Foundation**

Privacy Notice and Data Retention Policy

1. Introduction

The Peter Harrison Foundation (‘the Foundation’) takes the privacy of personal information very seriously. This Privacy Notice and Data Retention Policy is intended to make clear how the Foundation manages personal data for the purpose of carrying on its charitable grant giving and legitimate business activities.

The Foundation adheres to the principles of the General Data Protection Regulation, which specify that personal data must be:

* processed lawfully and fairly;
* collected for specific purposes;
* relevant and limited to what is necessary;
* accurate;
* kept secure and for no longer than necessary.

Personal data is information relating to an identifiable individual or individuals which may be provided through the Foundation’s website, by email or post, over the telephone or in person.

The Foundation may collect and hold personal data associated with the following:

* registered charities and other organisations applying for or in receipt of charitable grants;
* children and their families or carers applying for or in receipt of educational bursaries (Harrison Scholarships) at Reigate Grammar School;
* the Foundation’s trustees;
* the Foundation’s employees;
* suppliers of goods and services.
1. Responsible Person

The Foundation’s trustees have appointed the Director of the Foundation, Andrew Ross OBE, to be responsible for privacy and data protection matters. He may be contacted by email at aross@PeterHarrisonfoundation.org.

1. What Personal Data may be collected and kept by the Foundation and how is it used?

*Charity Grant Applicants*

* Applicants’ name, business address, email address and telephone numbers.
* The names and contact details for any third-party referees whose opinion may be sought about the standing of a grant applicant.
* Records of meetings and telephone conversations between grant applicants and the representatives of the Foundation.
* Individual case studies presented as examples of a grant applicant’s work.

The information above will be collected and stored on the Foundation’s electronic database system (‘Benefactor’), accessible only to individual password holders and within a paper filing system kept under lock and key. The information will be processed only for the purposes of assessing whether an applicant will be recommended to receive a grant and for receiving reports from time to time during or on termination of the period of a grant award. A statement on the Foundation’s website makes clear that by submitting an online Initial Enquiry Form the applicant gives consent for personal data to be held for these purposes.

*Applicants for Harrison Scholarships at Reigate Grammar School*

Signed consent for personal data to be held and processed must be sought from the parents or legal guardian of any child under the age of 18 on whose behalf a bursary application is made. Personal data concerning the child may include names, address, date of birth, exam results, other academic attainments, extra-curricular interests, school attendance and disciplinary records, family circumstances and any other relevant factors likely to help the Foundation’s trustees to determine an applicant’s suitability for an initial award and/or continuing financial assistance. The parents or guardian of a bursary applicant may be asked to provide detailed evidence of family income and financial or other assets, including payslips, bank statements, statements of mortgage or other debt.

This information will be held securely at the Foundation’s offices and may only be accessed by the Foundation’s trustees and staff and will not be disclosed to any third party other than, if appropriate, the Bursar at Reigate Grammar School. The information will only be used for the purpose of assessing the need and suitability for receipt of a Harrison Scholarship.

*Employees*

For the primary purpose of payment and taxation the Foundation will hold and process name, home address and telephone number, National Insurance number and bank details. In case of emergency the Foundation will keep the name of an employee’s next of kin or nominated third-party contact.

*Suppliers*

The Foundation will hold and process personal data associated with suppliers of goods and services only for the purpose of obtaining quotes for or receipt of such goods and services.

1. Retention of Data

The Foundation will retain personal data securely and for only as long as necessary to pursue its legitimate charitable objects.

Assessing a charity grant application will usually include a review of previous applications whether successful or not and this history may have some bearing on a decision to recommend a grant or not. Submission of the online Initial Enquiry Form entails explicit consent to retain relevant data indefinitely.

In relation to Harrison Scholarships personal and other data concerning a successful applicant and his or her family will be kept for the duration of the scholarship period, normally seven years from the date of admission to Reigate Grammar School. Subject to specific consent from school leavers themselves the names, contact details, further education and career details of former Harrison Scholars will be sought and retained beyond that period in order for the Foundation to evaluate the long-term benefits of its investment in educational bursaries. In the case of unsuccessful applicants the relevant data will be retained for no more than 12 months from the date of application.

1. Individual rights

Individuals have the right to know what personal data may be held about them, to have access to such data, to restrict the way it is used and to remove it should they wish to. The Foundation will aim to comply promptly with any such reasonable request, though withdrawal of personal information may necessarily limit access to the Foundation’s grant giving.

1. Data Accuracy and Security

The Foundation will take all reasonable steps to update or correct identifiable personal data when it is provided to us.

1. Third Party Processor

The Foundation has a contract for IT support services with a third party provider, the Gallery Partnership Ltd, which necessarily has responsibility for some aspects of data processing on behalf of the Foundation. These services include hosting the Foundation’s ‘Benefactor’ electronic database system, other cloud-based data storage and website development. The Gallery Partnership is under a contractual obligation to maintain data privacy and security on behalf of the Foundation and to ensure that data is processed in strict accordance with the Foundation’s requirements.

1. Comments and Queries

If at any time you have a comment or query about the Foundation’s data management or about personal information held by the Foundation, please contact the Director by email at aross@peterharrisonfoundation.org

27.4.2018