



DATA PROTECTION POLICY

The Orwell Foundation's Data Protection Policy applies to all employees, trustees and volunteers of The Orwell Foundation (Institute of Advanced Studies, University College London, Gower Street, London, WC1E 6BT). The Orwell Foundation is a registered charity, no. 1161563.

Operational date: 25th November 2019

1. Introduction

Purpose of this policy

The Orwell Foundation is committed to good practice in the handling of Personal Data and careful compliance with the requirements of the GDPR and UK Data Protection Bill 2018. The policy is designed to protect the interests of clients, staff and any individual whose data is processed by The Orwell Foundation, as well as the organisation itself.

Types of data

The Orwell Foundation needs to process information about employees, organisations and individuals who use our service. This includes the names and personal and/or business email addresses of entrants to The Orwell Prizes, partners and sponsors of the Foundation, attendees of events and subscribers to mailing list. It also includes the names, personal and/or email addresses, personal and/or business addresses and phone numbers of: members of The Orwell Fellowship, staff, trustees and volunteers (including Prize judges)

Policy statement

The Orwell Foundation respects individuals' rights and aims to be open, honest and transparent with individuals whose data we hold. We aim to be open and transparent in the way we use Personal Data, and will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used. The Foundation is committed to providing training and support for staff who handle personal data, so that they can act confidently and consistently.

The Foundation commits to notifying the ICO on any breaches of Personal Data under the GDPR and will voluntarily record any breaches of Personal Data not required under the GDPR and report these to the ICO. Our priority is to avoid causing harm to individuals. Principally, this means: keeping information securely in the right hands; holding good-quality information.

2. Responsibilities

The Orwell Foundation's Board of Trustees recognises its overall legal responsibility for Data Protection compliance. Day-to-day responsibility for Data Protection is delegated to a nominated Data Protection Officer, currently Jeremy Wikeley (Head of Policy). The main responsibilities of the Data Protection Officer are:

- Briefing the trustees on Data Protection responsibilities as required
- Reviewing Data Protection and related policies annually



- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training is provided for any new employee or intern of The Orwell Foundation
- Notification to the ICO
- Handling any subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors

All staff and volunteers of The Orwell Foundation are required to read, understand and accept any policies and procedures that relate to the personal data they may handle during their work.

3. Data recording, storage and security

Security

All staff must consult with and obtain permission from the Data Protection Officer before creating a Personal Data set. Access to Personal Data sets is strictly limited to staff of The Orwell Foundation.

Personal Data sets should, where reasonable, be password-protected. This includes individual documents, as well as Personal Data sets held with external Data Processors (.e.g. Mailchimp Eventbrite, GSuite, Dropbox, SAGE, NEST and WordPress). Any external hard drive containing personal data sets should be password-protected where possible. The Orwell Foundation's laptop computers should be password protected at all times.

When not in use, the laptops and external hard drives should be kept in a locked office or cabinet. Personal information held non-electronically shall be kept in a locked filing cabinet. All databases should be backed up periodically on a manual basis.

Sensitive personal data must not be stored on any database (e.g. information about an individual's ethnicity, religion, sexuality or health).

Retention periods

Personal Data of those who enter the Foundation's Prizes will be retained for a period of seven years, during in which time it will be used solely for the purposes of facilitating their entry for the Prizes.

Email addresses on the Orwell Foundation newsletter and Orwell Fellowship mailing list are retained indefinitely, subject to our annual review of the Data Protection policy by the Data Protection Officer and continued consent from the subject in question, which may be withdrawn at any time.

The CVs of those who make an application to work for The Orwell Foundation (and are unsuccessful), in any role, will be held for no longer than six months after the position for which they have applied has been filled unless we have express permission from the candidates.

The Personal Data of partners, sponsors, staff, trustees and volunteers of The Orwell Foundation will be held indefinitely, subject to the annual review of the Data Protection policy.



Personal Data about those who win or are shortlisted for The Orwell Prize will be held indefinitely, unless the subject requests that we do not do so. This is to maintain records for The Orwell Fellowship.

In all cases, The Orwell Foundation is committed to communicating openly, honestly and transparently the lawful basis under which an individual's Personal Data is processed and their individual rights in relation to the data which we hold.

Disposal

Documents containing personal information will be disposed of securely, either in confidential waste bins or shredded. Sensitive personal documents relating to the recruitment and employment of The Foundation's staff and trustees should be shredded prior to disposal.

4. Rights of access

The Data Protection Officer is responsible for ensuring that right of access requests are handled within the legal time limit, which is one month. Right of access requests must be presented to the DPO in writing. All staff are responsible to pass on any request which could reasonably be considered a subject access request to the Data Protection Officer without delay.

The Data Protection officer is responsible for verifying the identity of any individual before handing over any Personal Data.

The Orwell Foundation will not charge for subject access. Individuals can ask for a copy of the information records we hold about them, and for us to explain where we got our information. An individual only has the right to see personal information we hold about them personally – no one can ask to see another person's information.

5. Data processors

The Orwell Foundation commits to only appoint processors who can provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects protected. The Foundation commits to ensuring a written contract is in place in any appointment, the clauses of which must be subject to the requirements of the GDPR.

The Foundation's current Data Processors are: Wordpress & Doublesided (for Prize entries); Eventbrite (for event attendees); Mailchimp (for newsletters and mailing lists); GSuite (for email contacts); Dropbox (for digital databses).

6. Transparency

People have the right to know if we collect, store and use their personal information, and they can ask us to tell them what kinds of personal information we process, how we use the information, who we pass the information on to and in what circumstances we do so.



All the individuals about whom we collect data will be made aware of the uses that we make of the information about them, and in particular to, whom it may be disclosed. This information will be given at the time when data is collected. A statement to this effect should be included on all forms, surveys, questionnaires, and other documents where we ask for personal information.

Anyone wishing to update the information we hold about them, ask us to remove their Personal Data or make a subject access request to The Orwell Foundation should contact the Data Protection Officer either by post via The Orwell Foundation office (The Orwell Foundation, Institute of Advanced Studies, UCL, WC1E 6BT) or at jeremy.wikeley@orwellfoundation.com

7. Lawful basis

The Orwell Foundation is committed to ensuring that subjects are aware their data is being processed, for what purposes and under what lawful basis it is being processed, what types of disclosure are likely (if any) and how the subject may exercise their rights in relation to the data.

The table below details the Personal Data the Foundation processes and our recorded lawful bases for this processing. The lawful basis of any Personal Data set is subject to the annual review of the Data Protection policy by the Data Protection officer.

Subject	Personal Data held	Lawful basis
Orwell Prize entrants	Name and email address	Legitimate interest
Subscribers to newsletter	Name and email address	Consent
Event attendees	Name, email address and any additional needs	Legitimate interest
Staff, trustees and volunteers	Name, email address, phone number, PAYE information and home address	Legitimate interest
Partners and sponsors	Name, email address and business address	Legitimate interest
Individual donors	Name, email address and home address	Legitimate interest
Orwell Fellows	Name and email address, home and/or business address	Consent

If you have any questions about how The Orwell Foundation will use your personal information or information about your organisation, please email jeremy.wikeley@orwellfoundation.com

Policy prepared by Jeremy Wikeley (Data Protection Officer, The Orwell Foundation)

Date approved by Board of Trustees: 25th November 2019

Policy review date: 25th November 2020