

DATA PROTECTION POLICY

The Orwell Foundation needs to process information about employees, organisations and individuals who use our service. This includes judges, entrants to The Orwell Prize and event attendees, among others.

The Orwell Foundation is committed to good practice in the handling of Personal Data and careful compliance with the requirements of the Data Protection Act.

Our first priority is to avoid causing harm to individuals. Principally, this means:

- Keeping information securely in the right hands
- Holding good-quality information

When we process information, we need to keep to the terms of **the Data Protection Act 1998**. In particular, we need to make sure that we process information in line with eight principles of data protection, described in the Act, which state that information must be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate and up to date
5. Not kept for longer than is necessary
6. Processed in line with individuals' rights
7. Secure
8. Not transferred to other countries without adequate protection.

The Data Protection Act sets limits on the way we collect, store and use information. The Act controls

- a) how we file information
- b) how we access information
- c) how we pass information on to other organisations and individuals
- d) how and when we destroy information we are storing

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 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 the Programmes Manager. 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
- ensuring that Data Protection induction and training is provided for any new employee or intern of The Orwell Foundation
- keeping our notification with the information commissioner up to date¹
- handling any Subject Access requests

The Board is responsible for:

- approving unusual or controversial disclosures of Personal Data
- approving contracts with Data Processors

All trustees, officers and employees of The Orwell Foundation are responsible for

- ensuring that operation procedure takes full account of Data Protection requirements
- understanding and complying with the procedures that we have adopted in order to ensure Data Protection compliance.

STORAGE OF PERSONAL DATA IN ELECTRONIC FORM

To assist with Data Protection compliance, all staff must consult with and obtain permission from the Data Protection Officer before creating a Personal Data set.

Personal Data sets should, where reasonable, be saved as password-protected files. 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 necessary, the laptops and external hard drives should be kept in a locked office or cabinet.

SUBJECT ACCESS

The Act says that people have a right to access any information that we hold about them. This includes employees and people who use our services. The Act says that we have to respond to requests for access to information within 40 calendar days. The Orwell Foundation will not charge for Subject Access. People can ask for a copy of the information records we hold about them,

¹ Please note, the Orwell Foundation is not legally required to notify the Information Commissioner, but has decided to do so voluntarily.

and for us to explain where we got our information. If people want a copy of the information records we hold about them, they need to ask us in writing. We have to respond to written requests within 40 days. 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. If someone asks for a copy of their information record we need to check that they are the person the record is about.

In some situations, by giving out information about one person, we may also give out information that makes other people personally identifiable. The Data Protection Act (Section 7, sub-sections 4-7) has special rules to say what should happen in these situations and we must work in line with these rules.

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 (especially on the entry form to the Prize).

A statement to this effect should be included on all forms, surveys, questionnaires, and other documents where we ask for personal information. This will include the entry forms for the Prize.

All individuals will be given the opportunity to opt out of receiving marketing material, where applicable.

In general, all requests relating to the use, storing or deleting of records should be made by email to Jeremy Wikeley at jeremy.wikeley@orwellfoundation.com

PERSONAL DATA RETENTION

People can ask in writing to be removed from our records, or to say how and when we can use the information we hold about them. We need to deal with such requests within 21 days.

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

Personal Data of those who enter the Prizes will be retained for a period of three years.

Personal Data of those who make an application to work for The Orwell Foundation (and are unsuccessful) will be held for a period of six months after the position for which they have applied has been filled.

SECURITY MEASURES

All databases containing personal information shall be password-protected. This includes

- Any database held on The Orwell Foundation's computer system, particularly entry and event databases;
- Mailing lists;
- Documents containing personal information will be disposed of securely, either in confidential waste bins or shredded;
- Personal information held non-electronically shall be kept in a locked filing cabinet

When removing IT equipment from The Orwell Foundation offices, employees will ensure it is password protected and store it in a secure place. Access to this information is limited to The Orwell Foundation's staff and agents.

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

The database is backed up manually on a periodic basis.

Sensitive personal documents relating to the recruitment and employment of The Foundation's staff and trustees should be shredded prior to disposal.

DATA PROCESSORS

All contracts between our organisation and Data Processors will be reviewed by the Data Protection Officer for compliance with Data Protection Act requirements.

Currently, the Orwell Prize uses the following Data Processors:

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 Prize should contact the Data Protection Officer:

Jeremy Wikeley | jeremy.wikeley@orwellfoundation.com

DATA PROTECTION STATEMENT

- The Orwell Foundation upholds the right to privacy.
- The Orwell Foundation will respect the privacy of individuals when processing personal information.
- The Orwell Foundation will take appropriate measures to make sure that the data we hold is stored securely.
- The Board of Trustees of The Orwell Foundation has overall responsibility for making sure that The Orwell Foundation complies with the terms of the Data Protection Act.
- Staff are responsible for the security of the information they process and must not pass on information to anyone who is not entitled to it
- The Orwell Foundation's employees and people who use our services have the right to access personal information which The Foundation holds about them, whether in electronic or paper form. People who want to access information held about them should contact the Programmes Manager (jeremy.wikeley@orwellfoundation.com)

How we use personal information

Information given to The Orwell Foundation will be used by us to tell you about The Orwell Foundation's activities, and to give you information about these activities. Your name, and/or your organisation's name and the contact details will be added to our contact directory. If you do not want your organisation to be included in the directory, please contact the Programmes Manager.

The Orwell Foundation will communicate with you by telephone, letter, email, or in any other reasonable way. If you do not want to receive letters, emails and telephone calls from us in the future, please tell us by sending an email to jeremy.wikeley@orwellfoundation.com

You can ask for a copy of the information we hold about you and your organisation, and if the information isn't accurate, you can ask us to correct it.

The Orwell Foundation may pass your contact details on to data processors and other organisations with which The Orwell Foundation works (such as event venues). We will never pass your contact details on to salespeople. If you do not want us to pass on your information, please tell us via email.

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