



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: 9 October 2023

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, volunteers, organisations and individuals who take part in our prizes and programmes. This includes the names and personal and/or business email addresses of entrants to The Orwell Prizes, partners and sponsors and individual donors, attendees of Foundation events and subscribers to our mailing lists. It also includes the names, personal and/or email addresses, personal and/or businesses addresses of writers and journalists who have previously been nominated for The Orwell Prize or Orwell Youth Prize, Orwell Prize judges (including The Orwell Youth Prize, staff, trustees and volunteers.

The Foundation also needs to process information in order to help monitor our efforts to make sure our prizes and programmes are accessible to all and that our organisation reflects the communities we are seeking to serve. This includes the data about the age, ethnicity, sex, gender identity, sexuality and disability status of our trustees, staff, volunteers and job applicants, as well as of the writers and reporters who come through our prizes. Personal data of this kind will be anonymized before processing and disposed of appropriately once anonymized.

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 Data Protection Officer will record any potential breaches of Personal Data in an internal breach log. They will use the ICO's guidance to assess whether the breach is reportable and, where appropriate, notify the ICO of the incident and actions taken, in line with the GDPR. Our priority is to avoid causing harm to individuals. Principally, this means: keeping information securely in the right hands; holding good-quality information; learning lessons from any breaches of Personal data, both reportable and otherwise.

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 the Communications Manager. Their main responsibilities 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 are required to read, understand and accept any policies and procedures that relate to the personal data they may handle during their work. Any potential breaches of personal data should be reported to the Data Protection Officer as soon as possible on discovery.

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 Personal Data sets held with Data Processors. 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. In addition, personal security locks (by which, for instance, the laptop is secured to a table) should be provided where possible. Personal information held non-electronically shall be kept in a locked filing cabinet. All databases should be backed up periodically on a manual basis. Databases should in turn be kept in a locked cabinet.

Retention periods

The contact details (e.g. name, email address) of those who enter The Orwell 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, with the exception of entrants to The Orwell Youth Prize, whose data will be held for three years.

Email addresses on those subscribed to The Orwell Foundation's 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 contact details of those who make an application to work for The Orwell Foundation, in any role, will be held for no longer three years after the position for which they have applied has been filled unless we have express permission from the candidates.

The contact details 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. Contact 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.

Personal data collected for the purposes of monitoring the Foundation's equality and diversity targets will be anonymised as soon as possible.

The personal data of donors to The Orwell Foundation, including Friends and Patrons, will be held indefinitely, subject to our annual review of the Data Protection policy and continued consent from the subject in question, which may be withdrawn at any time.

A full record of retention periods is included below. In all cases, the 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, or any equivalent UK legislation which may replace it, 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 or any equivalent UK legislation which may replace it. The Foundation will keep a record of appointed data processors, which is reviewed each year.

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 info@orwellfoundation.com



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 Orwell Foundation processes, our recorded lawful bases for this processing and current retention period. 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	Retention period
Orwell Prize entrants, editors and publicists	Name and email address	Legitimate interest	7 years
Orwell Youth Prize entrants	Name, email address	Legitimate interest	3 years
	DOB, school, school year, Gender (self-described), Post code, first line of address	Legitimate interest	3 years; then anonymised
OYP parent/guardian safeguarding contact	Name, email address and phone number	Legitimate interest	3 years
Orwell Prize winners and shortlistees	Name, email address, DOB, home address	Legitimate interest	Indefinitely
	Sex, Gender identity, Ethnicity, Sexuality, Disability and/or health conditions	Consent	Anonymised asap and after six months latest
Orwell Youth Fellows	Name, email address, DOB, home address	Legitimate interest	Indefinitely
	Gender (self-described), Ethnicity (self-described)	Consent	Anonymised asap and after six months latest
Subscribers to Foundation mailing lists	Name and email address	Consent	Indefinitely, subject may withdraw right at any time
Orwell Foundation event attendees	Name, email address and additional needs	Legitimate interest	3 years



Orwell Youth Prize Workshop participants	Name, email address, DOB, Gender (self-described), School year and school	Legitimate interest	3 years
Staff, trustees and volunteers	Name, email address, DOB, phone numbers, PAYE information and home address. Age range, Sex, Gender identity, Ethnicity, Sexuality, Disability and/or health conditions	Legitimate interest Consent	Indefinitely Anonymised asap and after six months latest
Orwell Prize judges	Name, email address, home address and phone number	Legitimate interest	Indefinitely
Job applications	Name, email address and phone numbers Age range, Sex, Gender identity, Ethnicity, Sexuality, Disability and/or health conditions	Legitimate interest Consent	Three years Anonymised asap and after six months latest
Individual donors, including Friends and Patrons	Name, email address and home address	Legitimate interest	Indefinitely

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

Date approved by Board of Trustees: 9 October 2023

Policy review date: 8 October 2024