Grants Privacy Policy



Barts Charity understands that the security of your personal information is important and we are committed to protecting your privacy.

This Privacy Policy explains how we collect, store and use Personal Data for individuals that are involved in Barts Charity's funding activities, including:

- Individuals enquiring about funding opportunities
- Grant applicants and participants on grant applications
- Legally Responsible Contacts
- Grant holders and participants on an awarded grant
- Peer reviewers
- Expert advisers.

The Policy also provides information regarding:

- Who we are
- Diversity Monitoring
- How we store your information
- Transferring your information out of the UK
- Your rights
- How to contact us.

If you interact with Barts Charity for other reasons (e.g. giving donations, subscribing to our newsletters, through our website or social media accounts, etc) you can find out how we collect, use and store your Personal Data <u>here</u>.

It is important that the Personal Data that we hold for you is accurate. Please contact the Funding & Impact team (funding@bartscharity.org.uk) if any of your information changes.

Please check this document periodically for changes as the Charity reserves the right to change, modify, add, or remove portions of the Privacy Policy from time to time. We will contact you to let you know if we make significant changes to the Policy.

Who we are

Barts Charity is the data controller for the personal data processing described in this policy. We are a registered charity and our registration number is 212563. We are also a private company limited by guarantee registered in England and Wales under company number 7168381. Our registered address is 12 Cock Lane, London EC1A 9BU.

Individuals enquiring about funding opportunities

If you contact Barts Charity to discuss a potential funding request, **you may provide us with** the following information:

- First name, last name, title, ORCID ID
- Job title, affiliated organisation
- Email address
- Details of proposal

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to:

- Assess your eligibility for our funding schemes
- Assess the suitability of your project for our funding schemes
- Correspond with you in connection with your enquiry.

Where necessary, we share your information with:

 The organisation that will be responsible for administering the grant, if successful, and any planned collaborating organisation, for the purpose of managing your enquiry and potential application.

Grant applicants and participants in grant applications

When you apply for a grant, we will collect the following information from you (as lead or co-applicant) via our online application forms:

- First name, last name, title, ORCID ID
- Email address
- CV, including education and career history
- Information related to career breaks. We will not request or hold information that is considered special category personal data (such as health-related information)
- Letters of support
- Details of proposal
- With your consent, information for diversity monitoring purposes (see <u>Diversity Monitoring</u> for more information).

During this process **you may provide us with personal data related to others** (for example, <u>Legally Responsible Contact</u>, co-applicants, project team members, collaborators and potential peer reviewers). You must make these individuals aware of this Privacy Policy as it explains how we use their data.

We may **collect further information** or update the information we hold through:

- Emails or other correspondence
- Conversations with you in person or on the telephone.

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to:

- Assess your application for funding, including review and assessment by <u>Peer Reviewers</u> and Expert Advisers
- Award approved applications for funding
- Correspond with you in connection with your application
- Monitoring our funding process and portfolio.

Where necessary, we **share your information** with:

- <u>Peer Reviewers</u> and <u>Expert Advisers</u> for the purpose of reviewing, monitoring or evaluating your application
- The organisation that will be responsible for administering the grant, if awarded, and any planned collaborating organisation, for the purpose of managing your application your grant
- With potential donors who are interested in supporting your grant or Barts Charity more broadly, for the purpose of supporting the Charity's fundraising activities.

If you do not provide the information we need then we may be unable to process the grant application.

Legally Responsible Contacts

When a full application is submitted to Barts Charity, the lead applicant is asked to nominate a Legally Responsible Contact at the organisation that will be responsible for administering the grant, if awarded. This is a finance manager with appropriate delegated authority confirm the following on behalf of the organisation:

- The organisation is prepared to support this project at the stated costs
- Quoted staff grades and salaries quoted are correct and in accordance with the normal practice of this organisation

• If the application is successful, the organisation will administer the grant in accordance with Barts Charity's Terms and Conditions.

If you are nominated as a Legally Responsible Contact, the lead applicant will provide us with the following information on our online form:

- First name, last name
- Email address.

You might also provide us with the following information while completing the Legally Responsible Contact's approval forms:

- Title
- Job Title.

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to managing the application and (if successful) grant.

We will not share your information with any third parties.

If you do not provide the information we need then we may be unable to award a grant. If the grant conditions require you to provide the information then failing to do so may affect the continuation of the grant.

Grant holders and participants on an awarded grant

When you are awarded a grant, or are a participant on an awarded grant, we will store and use the information that was provided during the <u>grant application stage</u>.

We may collect further information or update the information we hold through:

- Monitoring processes
- Emails or other correspondence
- Conversations with you in person or on the telephone.

As a part of managing your grant, **you may provide us with personal data related to others** (for example, your co-applicants, collaborators and project team members). You must make these individuals aware of this Privacy Policy as it explains how we use their data.

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to:

- Manage your grant, including to correspond with you about the grant.
- Monitor the progress and outputs of your grant
- Maintain a record of the Charity's grant making activities
- Contact you about the possibility of communicating about the grant or its outcomes for marketing and/or fundraising purposes.

Where necessary, we share your information with:

- Expert Advisers, for the purpose of monitoring or evaluating your grant
- The organisation responsible for administering the grant and any collaborating organisation, for the purpose of managing and monitoring your grant
- Researchfish, for the purpose of monitoring your grants (for Research grants only)
- Regulatory bodies (e.g. the AMRC), for the purpose of meeting our reporting requirements
- donors who support your grant or are interested in supporting Barts Charity more generally, for the purpose of supporting the Charity's fundraising activities.

If you do not provide the information we need then we may be unable to award a grant. If the grant conditions require you to provide the information then failing to do so may affect the continuation of the grant.

Peer Reviewers

Peer reviewers are experts in the specific area of an application under review and are asked to provide advice as a part of Barts Charity's decision making processes on an ad hoc basis.

If you are considered for, or involved in the peer review process, we **collect the following information about you** from 1) third parties who recommend you, 2) institution websites and other external sources e.g. grant outputs such as publications and works, as well as citations of these outputs collected from public databases PubMed:

- first name, last name, title
- job title, affiliated organisation
- email address
- area of expertise

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to:

- determine your suitability as a reviewer
- contact you to invite you to participate in peer review
- provide you with the application and review forms through the Barts Charity Community
- receive back from you the details of your peer review which we will share with our Expert Advisers and also feedback to our applicants anonymously
- correspond with you in connection with peer reviewing an application.

We share your information:

- with Expert Advisers for the purpose of reviewing applications and making funding recommendations/decisions
- with donors or potential donors, for the purpose of demonstrating the quality of our review processes.

Expert Advisers

Expert Advisers are members of Barts Charity's Board of Trustees, Committees, Panels and/or other experts engaged by the Charity to review and assess funding applications.

We **collect the following information about you** from 1) you through informal correspondence 2) third parties who recommend you, 3) institution websites and other external sources e.g. grant outputs such as publications and works, as well as citations of these outputs collected from public databases PubMed:

- first name, last name, title
- affiliated organisation
- email address
- area of expertise.

We collect additional information for members of Barts Charity's Board of Trustees and delegated Committees, which is detailed in our Non-Executive Privacy Notice (available on request).

We **collect this information** on the legal basis that it is in Barts Charity's legitimate interests as a grant making organisation to:

- determine your suitability as an Expert Adviser
- contact you to invite be an Expert Adviser
- correspond with you in connection with the review and assessment of applications
- (with your consent), monitor diversity of our Expert Advisers information related diversity monitoring purposes (see Diversity Monitoring for more information)
- maintain a record of the Charity's grant making activities.

Diversity monitoring

Barts Charity is committed to ensuring that our grant application, assessment and monitoring processes are fair, accessible and inclusive. To monitor these processes and to identify areas for improvement, we ask all (lead or co-)applicants and Expert Advisers to provide us with the following information via our online Diversity Monitoring forms:

- Age
- Ethnicity
- Gender and Gender Identity
- Religious beliefs
- Sexual orientation
- Disability and long term health conditions.

The Diversity Monitoring form includes more information about why we collect, and how we will use, specific pieces of data.

You can request a new Diversity Monitoring form at any time to amend the information you have provided by contacting the Funding & Impact team (funding@bartscharity.org.uk).

We collect this information with the purpose of ensuring that:

- there are no biases in our application review processes
- the application, assessment and monitoring processes are inclusive and accessible.

We will not use this information during the assessment of grant applications or while monitoring active grants.

We collect, store and use this information on the basis of your consent, which you may choose to withdraw at any time by:

- Contacting the Funding & Impact team (<u>funding@bartscharity.org.uk</u>) to request a personalised diversity monitoring form
- Completing the form and selecting 'prefer not to say' for the relevant question(s).

We **will only share** your information with our IT service providers who process the data on our behalf solely in accordance with our instructions (see 'How we store your information', below).

We **store this information** in our Grants Management System (Salesforce). Additional security measures are placed around this data, for example it can only be accessed by one member of Charity staff (who is not involved in any application, assessment or monitoring processes). Data will only be analysed or reported in aggregated forms to protect the identity of individuals.

How we store your information

Barts Charity is committed to ensuring the security of your Personal Data.

Your information is stored using appropriate technical and organisational measures to ensure its security, including but not limited to:

- regular review of security measures of all data storage systems and emerging security risks
- regular training of Charity staff that access the information (data processors).

We keep your personal information in accordance with our Retention Policy, which takes into account:

- the purpose(s) for which the information was collected and how long we need to keep the information to achieve the purpose
- any applicable legal, accounting, reporting or regulatory requirements to keep the information.

Our IT infrastructure is provided by IT service providers, who store and process Personal Data on our behalf so that we can use the data in the ways described in this policy. We have contracts with those

IT service providers which require them to keep your data strictly confidential, and they are only permitted to use the data in accordance with our instructions.

For more information please contact us using the details at the end of this Policy.

Transferring your information out of the UK

We share Personal Data related to grant applicants and participants on grant applications with <u>Peer Reviewers</u> and <u>Expert Advisers</u> who may be based outside of the UK. We only do this were necessary for the purpose of assessing your application for funding.

We may also transfer your Personal Data out of the UK where our service providers referred to above are based outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards is implemented:

- We ensure that the country we are transferring the data to has been deemed under UK data protection laws to provide an adequate level of protection for Personal Data.
- If the country has not been deemed to provide an adequate level of protection we use specific contracts approved for use under UK data protection laws which give Personal Data an equivalent level of protection as it has in the UK.

Your rights

Data protection law grants you rights over the Personal Data we hold about you, specifically you have:

- The right to withdraw your consent for us to process any information you have provided us for diversity monitoring purposes.
- The right to request access to the information we hold about you (often referred to as a "subject access request") and we will provide you with a copy of this information.
- The right to rectify the information we hold about you. It is important that the personal information we hold about you is accurate and up to date. If any of the information that you have provided us with changes, please let the Funding & Impact team (funding@bartscharity.org.uk) know. If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records.
- The right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.
- The right to restrict our processing of your information ('right to restriction') if:
 - o you contest its accuracy and we need to verify whether it is accurate
 - o the processing is unlawful and you ask us to restrict use of it instead of erasing it
 - we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims.

If you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

- The right to data portability. You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability') vested in us.
- The right to object to the processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.

If you would like to exercise any of your rights above, please let us know using the contact details at the end of this Policy. We will normally respond to your request within one month, but if your request

is complex we may need to extend that timescale. If we do, we will write to you to explain why. There is normally no charge for exercising your rights. However, if a request is manifestly unfounded or excessive we may charge a reasonable fee or refuse to act on the request.

If you believe we have not used your Personal Data properly you have the right to lodge a complaint with the Information Commissioner. We would appreciate the opportunity to try to address your concerns directly before you decide to make a complaint.

Contact us

If you have any questions about this Privacy Policy, please contact us:

- By email on funding@bartscharity.org.uk
- By post: Chief Operating Officer, Barts Charity, 12 Cock Lane, London, EC1A 9BU