

Grants Privacy Policy

We understand that the security of your personal information is important, and we are committed to protecting your privacy.

This Privacy Policy explains how we collect, use and store your personal data, our approach to keeping it safe and secure and in what circumstances we may share it.

Scope

This Policy has been developed to explain the collection, use and storage of personal data for activities relating to Barts Charity's funding activities. It will state the processing activities, what types of personal data will be collected as part of those activities and justification on why these activities are vital to the proper functioning of Barts Charity's funding processes.

This policy was created in accordance with the UK General Data Protection Regulation (GDPR), Data Protection Act 2018 and any other standards and codes of conduct which Barts Charity is bound by.

If you have any questions about this Privacy Policy or how we use your data, please contact us using the contact details at the end of this Policy.

Who are we?

Barts Charity ('we, us') 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.

We are registered with the Information Commissioner's Office, registration number Z5198152.

What Personal Data do we collect and how do we use it?

We collect, store, and use personal data from individuals involved in, or with an interest in, Barts Charity's funding activities. These individuals include:

- Grant Enquirers
- Grant Applicants and Participants on Grant Applications
- Grant Administrators
- Grant Holders and Participants on Awarded Grants
- Peer Reviewers and Expert Advisors

We collect this information to deliver our funding services effectively, fulfilling both operational needs and regulatory obligations. The legal basis for our key processing is described below.

Assessment of Grant Applications

We assess personal data submitted in grant applications to evaluate funding suitability, process applications, and make funding decisions, relying on our legitimate interest in assessing applications fairly and thoroughly.

Managing and Administration of Grants

We share the personal data of successful applicants with the organisation responsible for administering the grant (the Administering Organisation) to ensure smooth grant management and delivery, relying on our legitimate interest in effectively managing and fulfilling awarded grants.

Screening Process for Peer Reviewers and Expert Advisors

We collect information on potential peer reviewers and expert advisors to confirm that their expertise aligns with a grant's or a panel's needs, relying on our legitimate interest in selecting qualified reviewers and advisors for informed decision-making.

Correspondence

We use your contact information to communicate with you regarding your application or grant, relying on our legitimate interest to keep you informed and updated on your application's progress, to support the management of your grant and related activities.

Review of Funding Process and Portfolio

We may review the data we collect to evaluate and improve our funding processes and portfolio, ensuring they support Barts Charity's goals, relying on our legitimate interest in conducting due diligence and enhancing the effectiveness of our funding.

Grant Applicants and Participants in Grant Applications

When you apply for a grant, we collect personal information from you as either the lead or a co-applicant via our online application forms. This includes your first name, last name, title, ORCID ID, email address, and CV detailing your education and career history. We may also collect information about career breaks, though we will not request or retain special category personal data, such as health-related information. Additionally, we collect letters of support, details about your proposal, and, with your consent, information for diversity monitoring purposes (please refer to the section on Diversity Monitoring for more details).

During the application process, you may provide us with personal data relating to other individuals involved in your proposal, such as your Legally Responsible Contact, co-applicants, project team members, collaborators, and potential peer reviewers. We may also gather further information or update the data we hold through email communications, other written correspondence, or conversations with you (or the Grants Administrator) in person or by phone as necessary to support your application.

Barts Charity may use AI-powered tools to assist with the peer review process for grant applications. This tool analyses grant application materials to recommend suitable reviewers

based on research content, keywords, and terminology, which Barts Charity staff will consider before making the final decision on whom to approach for peer review.

Our lawful basis for this processing is legitimate interests under Article 6(1)(f) of the UK GDPR, specifically, our interest in ensuring efficient, fair, and high-quality grant peer review.

Grant Administrators

We collect and store personal data related to individuals based at the Administering Organisation who play a role in the management of applications to Barts Charity as well as awarded grants to ensure the smooth management and administration of related processes.

When a full application is submitted to Barts Charity, the lead applicant is required to nominate a Legally Responsible Contact within their organisation, providing their first name, last name, job title, affiliated organisation and email address. This individual must have the appropriate delegated authority to approve applications and agree to Grant Terms and Conditions on behalf of the Administering Organisation.

While managing an active grant, additional administrators' personal data (including first name, last name, job title, affiliated organisation and email address) may be collected through informal correspondence and used to contact these individuals to support with the management of an awarded 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 retain and use the information provided during the application stage. Additional information may be collected or existing information updated through our ongoing monitoring processes, email communications, other written correspondence, or conversations with you (or the Grant Administrator) in person or by phone as needed to manage your grant effectively. In the course of managing your grant, you or the Grant Administrator may also provide us with personal data related to other individuals involved in the project, such as co-applicants, collaborators, and project team members.

Peer Reviewers

Peer reviewers are experts in specific fields relevant to the applications under review and are engaged by Barts Charity on an ad hoc basis to provide advisory support in the decision-making process. If you are considered for or involved in the peer review process, we may collect certain information about you from third-party recommendations, institutional websites, and other external sources. These may include outputs such as publications, works, and citation data from public databases like PubMed. The information we collect includes your first name, last name, title, job title, affiliated organisation, email address, and area of expertise.

Expert Advisers

Expert Advisers serve on Barts Charity's Board of Trustees, Committees, Panels, or as other external experts engaged in reviewing and assessing funding applications. We may gather

information about you through informal correspondence with you, third-party recommendations, and publicly available sources, such as institutional websites or databases like PubMed, which include outputs (such as publications) and citations. The collected data typically includes your first name, last name, title, affiliated organisation, email address, and area of expertise. For members of Barts Charity's Board of Trustees and delegated Committees, we collect additional information as outlined in our Non-Executive Privacy Notice, which is available upon request.

Processing Special Categories of Data

We process special category data primarily for diversity monitoring and reporting purposes across our funding activities. This includes collecting data on age, gender and gender identity, ethnicity, sexual orientation, religious beliefs, and disability or long-term health conditions from individuals involved in our grant processes, including grant applicants, grant holders, peer reviewers, and expert advisers. This processing supports our commitment to diversity and inclusion and ensures compliance with legal reporting requirements.

Processing of this data is conducted in strict accordance with Article 9 of the UK GDPR, based on our legal obligations for reporting diversity statistics and with substantial public interest as the legal basis. We maintain additional safeguards to protect this information and uphold regulatory standards, ensuring that sensitive data is processed only when necessary and relevant to our operational requirements.

How we store your information

We are committed to ensuring that your personal data is treated with the utmost confidentiality and safeguarded against unauthorised access, use, or disclosure. We implement a variety of security technologies and procedures, such as encryption and secure networks, to protect your personal data. If you would like more information on how we ensure data security, please contact us directly.

How long do we keep your personal data for?

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including meeting any legal, accounting, or reporting requirements.

Our data retention periods are guided by the specific purposes for which the data was collected and any applicable regulatory requirements.

The majority of the data collected falling under this policy will be kept for a period of 7 years before being appropriately disposed of. In the case of personal data stored solely for marketing purposes, if consent is withdrawn, we will look to dispose of the data as soon as we are notified that you have withdrawn your consent, unless we need to retain it to carry out our legal obligations.

If you would like to know more about how long your data is retained for or what happens once it reaches the end of its retention period, please contact us using the contact details at the end of the document below.

Sharing of Personal Data

We may share your personal data only in specific situations where it is necessary for our operations or required by law:

- **Administering Organisation:** We will share the data of successful applicants with the selected Administering Organisation for the purposes of them carrying out the process of administering the grant.
- **Peer Reviewers and Expert Advisers:** As mentioned above, Peer Reviewers and Expert Advisers will be given access to grant applications (including the applicants' personal data) for the purpose of carrying out their own independent assessment and advising on decision-making.
- **Open Access Publishing Platforms:** Lead and co-applicant names and grant details will be shared with open access platform hosts to enable grant outputs to be made publicly accessible.
- **Output Tracking Tools:** Lead and co-applicant names and grant details will be shared with tools that can track the outputs, outcomes and impact of research supported by Barts Charity. We use the datasets generated by these tools to analyse the ongoing impact of the grants we fund.
- **Potential Donors:** We may share details of a grant application/current grant holder if we believe that the donor in question may be interested in supporting the project or further supporting Barts Charity.
- **Marketing Agencies:** To communicate with supporters and promote our work, we collaborate with third-party agencies for online and print campaigns.
- **Regulatory Bodies:** We may share data with regulatory authorities to ensure compliance with our legal obligations.

We do not sell or share your data with third parties for their own marketing purposes.

Transferring your information out of the UK

We may transfer your personal data outside the UK, including to countries with varying data protection laws, when working with overseas service providers.

Whenever we transfer your personal information outside of the UK and/or EEA, we implement at least one of the following safeguards to ensure an equivalent level of protection:

- We will only transfer your personal information to a country that provides an adequate level of protection for personal data, as determined by the UK or EEA data protection regime.

- Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs): If the country does not have an adequacy decision, we will use contracts approved under UK GDPR, ensuring the same level of protection for your data as within the UK.

Please contact us if you wish to learn more about the specific mechanism we employ when transferring your personal data outside the United Kingdom and/or the EEA.

Your rights

Under data protection law, you have several rights regarding the personal data we hold about you. These rights include:

- Right to be informed: You have the right to be informed about how and why we collect and use your personal data.
- Right of access: You can request a copy of the personal data we hold about you.
- Right to rectification: If any information we hold is inaccurate or incomplete, you can ask us to correct or update it.
- Right to erasure ("Right to be forgotten"): You can request that we delete your personal data when it is no longer necessary for us to hold it, or if you withdraw your consent. This is subject to certain legal obligations.
- Right to restrict processing: In some circumstances, you can ask us to limit the way we use your data. For example, if you contest its accuracy or if you need the data to defend a legal claim.
- Right to data portability: You have the right to obtain and reuse your personal data for your own purposes across different services.
- Right to object: You can object to how we use your data in certain situations, such as for direct marketing.
- Right to withdraw consent: Where we rely on your consent for processing, you can withdraw that consent at any time.

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 feel that we have not handled your personal data properly, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). However, we would appreciate the opportunity to resolve your concerns first.

Changes to this Privacy Notice

Barts Charity may change, modify, add, or remove portions of the Privacy Policy from time to time reflect changes in our practices or relevant laws. Whilst we will notify you of any significant changes that may affect your rights or the way in which we process your data Please check this document periodically for changes and to stay informed on how your data is used.

Contact Us

If you have any questions or comments regarding this Privacy Statement, please get in touch with us at:

Email: funding@bartscharity.org.uk

Phone: 0207 618 1720

Address: Barts Charity, 12 Cock Lane, London EC1A 9BU

If you believe that we have not handled your personal data in accordance with applicable data protection laws, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). We encourage you to contact us first, so we can try to resolve any concerns directly.

ICO Contact Details:

Website: <https://ico.org.uk>

Phone: 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.