

# The Laurel Trust

## Privacy policy

**Date of last review: 21 May 2018**

**Date of next review: 31 May 2020**

**Review Period: 2 years**

**Owner: The Laurel Trust**

# Privacy Policy

The Laurel Trust (“the Trust”) is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection the Data Controller is the Trust.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers the Trust in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this web page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information please contact the Company Secretary Ian Pearce at [ian.pearce@ipcep-consulting.com](mailto:ian.pearce@ipcep-consulting.com) or by post to the Trust's registered office at The Laurel Trust, 10 Queen Street Place, London EC4R 1BE.

## What type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you contact the Trust comprises your contact details including your full name, professional or volunteer role, workplace or institutional email address, workplace or institutional postal address and the phone number you supply for communications.

If you are a trustee, consultant or volunteer involved in a research project supported by the Trust, we will collect your contact details to contact you in relation to the Trust' educational activities, your financial details for payment of grants and any expenses, and any other data we are required to collect by law.

If you are a grant applicant as part of a collaborative partnership with a lead school the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application and if your proposal is awarded a grant for communicating effectively with you throughout the research project and the dissemination of outcomes.

## How we collect information

We may collect information from you whenever you contact us or have any involvement with the activities of the Trust for example when you:

- visit our website and contact us (we do not use Cookies);
- enquire about our activities or grants or apply for a grant;
- participate in a collaborative partnership with a lead school undertaking a research project receiving funding from the Trust;
- attend a meeting with us or participate in a conference, seminar or the preparation of a publication and provide us with information; and
- contact us in any way including email, phone or post.

## Where we collect information

We collect information:

- (1) from you when you give it to us directly: you may provide your details when you ask us for information about the work of the Trust, apply for a grant as part of a collaborative partnership,

join a collaborative partnership undertaking a research project receiving funding from the Trust, attend one of our events or contact us for any other reason;

- (2) when you give it to us indirectly: your information may be given to us with your permission by the lead school and/or other partners in your collaborative partnership applying for a grant or undertaking a research project with funding from the Trust; and
- (3) when you have given other organisations permission to share it: your contact information may be provided to us by other educational organisations which are partners in research projects supported by the Trust such as a local authority, diocesan authority, university, Teaching School Alliance, Multi Academy Trust, other form of school consortia, partnership of providers including Early Years Networks or specialist educational membership organisation.

### **How we use your information**

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These include:

- providing you with the information or guidance you have asked for;
- organising induction conferences and other forms of training and guidance;
- sending you communications with your consent including promotional materials announcing new tranches of grants for educational research;
- when necessary for carrying out your obligations under the Memorandum of Agreement contract between us and the educational providers receiving grants from the Trust;
- seeking your views on the services or activities we carry on so that we can make improvements;
- maintaining our organisational records and ensuring we know how you prefer to be contacted;
- analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness;
- processing grant applications;
- communicating with all involved in research projects receiving funding from the Trust and monitoring progress including arranging visits by trustees and/or consultants;
- communicating with all involved in the Trust's dissemination activities including conferences and publications; and
- Providing information to volunteers where appropriate
- providing information to our trustees responsible for the governance of the Trust and monitoring its activities, commissioned consultants responsible for managing the operations of the Trust and our professional advisers including our solicitors (Stone King LLP), auditors (MacIntyre Hudson LLP) and outsourced financial management provider (MacIntyre Hudson LLP) for legitimate interest reasons such as to facilitate seeking legal advice and/or payment of grants to lead schools and their collaborative partnerships.

### **Our legal basis for processing your information**

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information and guidance on the activities of the Trust to promote educational research and dissemination or applying directly or via involvement in a collaborative partnership for a grant to help fund a research project, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing the Trust's Company Secretary (at [ian.pearce@ipcep-consulting.com](mailto:ian.pearce@ipcep-consulting.com)). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- It is necessary for us to hold and use your information so that we can carry out our obligations under the contract (Memorandum of Agreement for a Laurel Trust Grant) entered into with you directly or to take steps you ask us to prior to entering into a contract.

- Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests and those of the Trust that we provide the information to our outsourced financial manager, auditors and/or solicitors to facilitate such actions as payments of grants, monitoring expenditure for auditing purposes and ensuring legal compliance. [If you do decide to use the legitimate interest legal basis for the grant administration/ monitoring/ dissemination, include some wording here]
- It is necessary to comply with our legal obligations such as providing financial information on charitable expenditure for the annual statutory audit required by charity and company law.

Where we are relying on the fact that a particular processing purpose is necessary for our legitimate interests, or the legitimate interests of a third party, you can obtain the details of the balancing test we have undertaken on request by contacting the Company Secretary (at [ian.pearce@ipcep-consulting.com](mailto:ian.pearce@ipcep-consulting.com)).

### **How we keep your information safe**

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

Under our environmental policy as far as possible we make every reasonable effort to be a paper-free organisation and therefore our materials are available on-line and our communications are sent electronically by email with attachments for documents.

We always ensure only authorised persons such as trustees, commissioned consultants and professional advisers have access to your information and all have the appropriate training and professional experience to manage your information.

No data transmission over the Internet can however be guaranteed to be 100% secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

### **Who has access to your information?**

The following categories of persons may access your information:

- professional advisers and service providers including third party solicitors and auditors and providers of book-keeping, banking and investment advice and management services where we select our third party service providers with care (our professional advisers are subject to GDPR and have renowned national awards and positioning for charity services) and only provide these third parties with the information that is necessary to provide the service.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

### **Keeping your information up to date**

We really appreciate it if you let us know if your contact details change. You can do so by contacting the Company Secretary at [ian.pearce@ipcep-consulting.com](mailto:ian.pearce@ipcep-consulting.com).

### **Our use of “cookies”**

We do not use “Cookies” on our website.

### **Children’s and special category personal information including sensitive information**

All involved in the governance and operations of the Trust have substantial qualifications and professional experience in the education sector and we are fully aware of our legal obligations on both children's information and special category personal data.

In all circumstances the Trust will not collect or process any special category personal data above or any information on individual children involved in research projects. The confidentiality and processing of all personal information with regard to children will be the responsibility of the schools and other educational providers involved in research projects receiving grants from the Trust.

### **How long we keep your information for**

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of those who enquire about the activities of the Trust for two years and for those involved in a research project receiving a grant from the Trust and dissemination activities for 5 years.

### **Your rights**

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request contact the Company Secretary (at [ian.pearce@ipcep-consulting.com](mailto:ian.pearce@ipcep-consulting.com)).

You also have the following rights under the GDPR:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the "right to be forgotten");
- the right to restrict the way in which we are dealing with and using your information;
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the "right to portability"); and
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact the Company Secretary at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found [here](#).

### **Changes to this Privacy Policy**

This Policy may be revised from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information.

Do please check this Policy each time you consider giving your personal information to us.

This Policy was last updated on 24 May 2018.

Stone King LLP  
23 October 2017

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