



The Tottenham Grammar School Foundation

General Data Protection Regulation (GDPR) Policy

1. Purpose and Scope

This policy sets out how the Tottenham Grammar School Foundation (TGSF) collects, stores, uses and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It applies to all personal data held by the Foundation, whether in paper or electronic form, relating to applicants, beneficiaries and Trustees.

This policy should be read with reference to the **Review of arrangements relating to the General Data Protection Regulation** approved by the Trustees in October 2024.

2. Principles

TGSF will comply with the UK GDPR principles, ensuring that personal data are:

1. Processed lawfully, fairly and transparently.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and, where necessary, kept up to date.
5. Kept only as long as necessary.
6. Processed securely to protect against unauthorised or unlawful processing, loss, or damage.

3. Lawful Bases for Processing

TGSF processes personal data under the following lawful bases:

- Consent – given through the completion of award or grant application forms.
- Contractual necessity – where processing is needed to administer awards or grants.
- Legitimate interests – for governance and record keeping.
- Legal obligation – where processing is required by law.

Where special category data are processed (e.g. information relating to a special educational need in support of an application), TGSF relies on Article 9(2)(d) UK GDPR: processing carried out in the course of legitimate activities by a not-for-profit body with appropriate safeguards, limited to applicants, beneficiaries or Trustees, and not disclosed outside without consent.

4. Data Collected

TGSF may collect and process personal information including:

- Contact details (name, address, email, phone)

- Date of birth
- Bank account details (for award payments)
- Education and training records (to assess eligibility)
- Information supplied in support of applications (including details of special educational needs where relevant)
- Trustee contact details for governance purposes

5. Data Security

TGSF will:

- Use password protection and encryption for databases and spreadsheets containing personal data
- Store paper records securely in locked cabinets
- Back up electronic files to a secure off-site location, at least daily
- Restrict access to personal data to the Clerk and Trustees on a need-to-know basis
- Use secure online forms for collecting application data

6. Data Retention

- Applicant and beneficiary data will normally be retained for up to six years after the last contact, or as long as is necessary to administer ongoing awards, scholarships, bursaries or grants.
- Trustee and governance records will be retained as long as required for charity law and compliance.
- Financial records will be kept for the minimum statutory period (currently six years).

7. Sharing of Data

TGSF will not sell or trade personal data. Data may be shared only:

- With Trustees to allow for decision making on funding requests where relevant.
- Where necessary with partner organisations, schools or colleges to confirm eligibility.
- With professional advisers (e.g. auditors, lawyers) where required for governance.
- Where legally required (e.g. HMRC, regulators).

Any sharing will be proportionate, limited and subject to safeguards.

- Trustees must delete electronic copies of any documents containing applicants' personal data that have been shared for Trustee meetings once the meeting has concluded.
- Documents containing applicants' personal data will be removed from the data-sharing platform promptly after each meeting.

8. Rights of Data Subjects

Individuals whose data are held by TGSF have the following rights:

- To be informed about how their data are used.
- To access a copy of their data (subject access request).
- To request rectification of inaccurate data.
- To request erasure of data (where lawful and appropriate).
- To restrict or object to processing.
- To data portability (where applicable).

Requests should be made to in writing and emailed to: **the Clerk to the Board of Trustees** (helen.froggatt@tgsf.org.uk). TGSF will respond within one month.

9. Breach Management

TGSF will maintain procedures to detect, report and investigate personal data breaches. Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours where required, and to affected individuals without undue delay.

10. Responsibilities

- Trustees are ultimately responsible for ensuring compliance with data protection law.
- The Clerk acts as Data Protection Lead, responsible for day-to-day management and compliance.
- All Trustees and the Clerk must follow this policy.

11. Review

This policy will be reviewed by Trustees at least every **two** years, or sooner if there are changes in legislation or practice.

Approved by the Chair of Trustees: Graham Kantorowicz



Date: 11 November 2025 (Awards Committee Meeting)

Next review date: November 2027