

THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARITY
(Registered Charity Number: 700239)

APPLICATION PACK

CONTENTS

This Application Pack includes the following:

- Information Sheet
- Application Form
- Supplemental Information Sheet for CRS Purposes
- Appendix To Grant Application Form Definitions
- Grantholder and Applicant Privacy Notice

THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARITY
(Registered Charity Number: 700239)

INFORMATION SHEET

BACKGROUND

The Charity was established by a Trust Deed dated 6 April 1988 in the memory of Anthony and Gwendoline Wylde. It was registered with the Charity Commission on 11 May 1988. The Charity is a grant making trust whose objects are "to make grants to such Charities for such charitable purposes as the Trustees shall in their absolute discretion decide".

GENERAL PRINCIPLES

The Charity makes grants to and for the benefit of individuals and charitable organisations residing in the WV4, WV5, DY3, DY6, DY7, DY8, DY9, DY10 and DY11 postcodes.

The Trustees are prepared to receive a wide range of requests, provided that the applicant can show the benefits that would be derived from a grant, and that other sources of funding are not available.

Funding is available for assistance towards course fees but the trustees will require a copy of a letter or email from the school/college/university, confirming the applicant is due to take a course, or a copy of the course details showing the student's name.

Please note the Trustees do not fund organisations which are not 'charitable' (within the meaning of the law) and do not contribute to costs that can be met out of State resources. Further guidance as to grant funding priorities, restrictions, how to apply and the history of the charity is available on the Charity's website www.wyldecharity.weebly.com

Prospective applicants should be aware that their application may be unsuccessful. The number of projects that can be supported is, as a necessity, limited the amount of funds available for distribution in any year and it may not be possible, therefore, for the Trustees to make an award even within the grant funding priorities.

PROCESS

The Charity has two Grant programmes, one for small grants up to the amount of £1,000. These can be dealt with as and when they arise. The second is for large grants for amounts above £1,000 and are considered at trustees' meetings.

The Trustees meet twice a year usually in May and November. All applications for grants should be completed and submitted online at the charity's website. If it is not possible for an application to be submitted online postal application forms can be provided on request to the Clerk, Kirsty McEwen.

Please be advised that the Trustees may require or request further information following the meeting.

If the application is unsuccessful, you will be advised of such in writing, but the Trustees are not required to provide any further information as to the basis of that decision.

THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARITY
(Registered charity number: 700239)

SMALL GRANT APPLICATION FORM - ORGANISATIONS

NB: Due to recent regulatory changes, the Trustees are legally required to confirm that any grant applicants are resident in the UK for tax purposes.

Unfortunately the Trustees will not be able to consider a grant application if all of the requested information about a grant applicant's tax residency is not provided.

If you would like assistance with any of the tax-related questions below please seek independent advice from a tax specialist prior to completing this form.

PART A – GENERAL INFORMATION

1. The name of the organisation	
2. Registered office of the organisation or address from which the organisation operates (please include postcode)	
3. Telephone number (of the organisation)	
4. E-mail address (of the organisation)	
5. Name of contact person at the organisation (for the application)	
6. Position of contact person in the organisation	
7. Address for correspondence, if different from 2. (please include postcode)	
8. Nature of work undertaken by the organisation	
9. Is the organisation a Charity?	

PART B – REGISTRATION AND TAX INFORMATION

NB. Charities registered in the UK with the Charity Commission, OSCR, the Charity Commission for Northern Ireland or HMRC are presumed to be UK tax resident.

1. Please confirm the country of	
----------------------------------	--

incorporation/registration	
2. In which year was the organisation established	
3. (i) Are you registered with the Charity Commission, OSCR or CCNI?	
(ii) What is your registered charity number or is registration pending?	
(iii) Are you registered with HMRC as a charity for tax purposes ?	
(iv) What is your unique tax reference number with HMRC?	
<p>If you answered YES to EITHER questions Part 2, 3(i) or 3(iii) you are considered to be tax resident in the UK.</p> <p>Please proceed to Part C.</p>	
<p>If you answered NO to BOTH questions 12(i) and 12(ii) , please also complete and return the Supplemental Information form attached.</p> <p>Please also proceed to complete the remainder of this form.</p>	
<p>PART C – ABOUT THE ORGANISATION</p>	
<p>1. Briefly describe the objects or charitable purposes of the organisation:</p>	
<p>2. Briefly describe the activities of the organisation:</p>	
<p>3. Has an application been made to the Charity before:</p>	
<p>4. If yes, please state the date and outcome:</p>	

PART D – THE APPLICATION

1. Please summarise the purpose for which the grant will be used in no more than 50 words:

2. Is the grant being sought towards the organisation's operational costs or the cost of a specific project:

3. Please confirm the total project costs and provide details of the specification of the works and the estimate of costs provided:

4. Please advise of the amount that is requested by way of grant: £

5. Please confirm what funding and from whom you have towards the project costs:

6. Please confirm how any balance will be raised:

7. Please provide evidence as to why such support by way of grant is required (and attach any additional information such as report, brochures and testimonials as is helpful):

8. Please confirm how you will assess the impact and success of the grant funding:

9. Please confirm who your beneficiaries are:

10. Please confirm how your organisation currently satisfies the public benefit test (as defined):

11. Please confirm how you consider this project in particular will further the public

benefit – as defined by the Charity Commission, OSCR or CCNI:

PART E – FINANCIAL INFORMATION

1. Please provide copies of the last filed annual reports and accounts of the organisation. If these are not available, please state the reason:
2. Please confirm that the organisation operates as a “going concern”:
3. Please confirm that there have been no qualifications on your accounts in the past three years:
4. Please advise as to any concerns raised by your accountants or auditors in the past 12 months as to financial viability or stability:
5. To whom should cheques be made payable to, if the application is successful:

PART F – REPORTING

It is the policy of the Trustees to monitor all grants made and they may require the organisation to undertake any or all of the following:

1. To this end, before a grant can be confirmed, conditions may be stipulated appropriate to the work to be carried out and progress will be assessed against the agreed targets and/or milestones.
2. If the grant is payable in instalments, then payment of subsequent grant instalments will be dependent on satisfactory progress having been demonstrated and the Trustees reserve the right to withdraw the grant on receipt of unsatisfactory progress reports.
3. Failure to submit reports at the time specified by the Trustees may jeopardise the continuation of the Charity’s support.
4. In addition to reports detailing progress, grant recipients may be expected to provide:
 - (a) A statement of how their monies have been spent for the year; and
 - (b) Details (where appropriate) of any other funds applied to the same project.
5. Monitoring visits by representatives of the Charity may be undertaken during the period of grant.
6. The Trustees may request copies of any published articles, papers or other which

may result in the project.

7. Following the conclusion of the project, the grant recipient, may be required to submit a final report, normally within six months of the end of the grant, detailing fully the results and outputs in the project.
8. The grant recipient must inform the Charity of any extenuating circumstances whereby submission of the final report is delayed, to allow mutually acceptable dates for submission to be agreed (if required after final report).

PART G - HOW DID YOU HEAR ABOUT THE CHARITY?

From the Trustees' perspective it is always useful to know how individuals come across the Charity. Can you give us some indication of how you heard about the Charity and its work:

Please provide copies of the following information:

- your governing document;
- any additional information such as report, brochures and testimonials (if helpful); and
- copies of the last filed Trustees' Annual Reports and accounts of the organisation.

DECLARATION

When the application form has been completed by a trustee or authorised official or representative of the organisation they must sign the declaration below.

All applications and supporting information must be sent by e-mail to charity.administration@higgsllp.co.uk or by post to: The Anthony and Gwendoline Wylde Memorial Charity c/o Higgs LLP, 3 Waterfront Business Park, Brierley Hill, West Midlands, DY5 1LX.

Please be advised that the Trustees do not accept applications by fax.

I confirm that the organisation will notify you about any changes to the information provided within 30 days of the change, which affects its tax residency status or which causes the information provided to become incorrect or incomplete and will complete an updated self-certification form.

I, confirm that I have received a copy of The Anthony and Gwendoline Wylde Memorial Charity's privacy notice ("**Privacy Notice**") and that I have read and understood it.

I give my consent for The Anthony and Gwendoline Wylde Memorial Charity to process my data in line with the Privacy Notice, including any special category data which is relevant to my grant application and which is collected in accordance with the Privacy Notice.

I confirm that to the best of my knowledge the information provided is correct and I am authorised to submit this application on behalf of The Anthony and Gwendoline Wylde Memorial Charity:

Print full name:.....

Signed.....

Position in organisation:

Date.....

CHECKLIST

Before signing please ensure that:

- You have answered all of the questions and signed the Declaration.
- You have enclosed your last filed annual report and accounts.
- You have enclosed any supporting literature that you feel relevant.

THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARITY
(Registered charity number: 700239)

SUPPLEMENTAL INFORMATION SHEET FOR CRS PURPOSES

NB: Due to recent regulatory changes, the Trustees are legally required to confirm that any grant applicants are resident in the UK for tax purposes.

Unfortunately the Trustees will not be able to consider a grant application if all of the requested information about a grant applicant's tax residency is not provided.

If you would like assistance with any of the tax-related questions below please seek independent advice from a tax specialist prior to completing this form.

ADDITIONAL REGISTRATION AND TAX INFORMATION

10. Please confirm what type of organisation you are? For example, CASC, CIC, Co-operative Society, Community Benefit Society or other	
11. (i) Is the organisation tax resident in the UK only ?	<input type="checkbox"/> Yes <input type="checkbox"/> No
(ii) Is the organisation tax resident in the UK and another jurisdiction? • If yes, in which other jurisdiction is the organisation tax resident in?	<input type="checkbox"/> Yes <input type="checkbox"/> No
(iii) Is the organisation not tax resident in the UK? • If yes, in which jurisdiction is the organisation tax resident in?	<input type="checkbox"/> Yes <input type="checkbox"/> No
12. If you cannot confirm details of the organisation's tax residency, please explain why	
13. Please confirm the organisation's tax registration / tax identification numbers from each of the countries in which the organisation is tax resident	

14. Entity Classification

We need to determine the Entity Classification of your organisation based on the nature of your activities, income, type and location. If you are unsure about what entity classification your organisation falls under you will need to seek appropriate independent advice from a tax specialist.

Tick any statement in parts (i)-(iii) which applies to you to confirm your entity classification.

(i)

Are you a non-profit organisation with less than 50% of your income deriving from investments? ☐

Are you an actively trading entity? ☐

Are you a government entity? ☐

Are you an international organisation as defined by HMRC? ☐

Are you a corporation whose stock is regularly traded on an established securities market, or a related Entity of such a corporation? ☐

If you ticked any of the boxes in 5(i) above, you are an Active Non-Financial Entity (Active NFE).

☐ **I declare that this entity is an Active NFE**

(ii)

Are you a Custodial Institution, Depository Institution, Investment Entity, or Specified Insurance Company and tax resident in a participating jurisdiction? ☐

Are you a charity deriving more than 50% of your income from investments and which has granted discretionary management to (an) external manager(s)? ☐

Are you managed by a Financial Institution and located in a participating jurisdiction? ☐

If you ticked any of the boxes in 5(ii) above, you are a Financial Institution, or an Investment Entity which is a type of Financial Institution

☐ **I declare that this entity is a Financial Institution**

(iii)

Does more than 50% of your income derive from investments over which your organisation has not granted discretionary management to (an) external manager(s)? ☐

Do you meet the definition of a Financial Institution Entity but are not tax resident in a participating jurisdiction? ☐

If you ticked any of the boxes in 5(iii) above, you are a Passive Non-Financial

Entity (NFE).

☐ **I declare that this entity is a Passive NFE**

If your Entity classifies as a **Passive NFE**, each one of the Controlling Persons must provide further information to identify the Controlling Person(s) of the organisation and we will send a further self-certification form to you for completion.

For definitions of the terms used above please refer to the enclosed Appendix.

15. Please give any additional addresses that are relevant to the organisation's tax residency status

Address:

If the organisation receives a grant from the Trustees and it is clear from the information above that it is a 'Reportable Entity', the Trustees will be required by law to provide that information to HMRC and this may be transferred to the government or another entity which has a relevant agreement in place.

Note that even if the organisation is not currently paying tax in a country this does not mean that it is not tax resident in that country. The organisation may be tax resident in a country but just not have been issued a tax number or equivalent. Please ensure the correct position is detailed above.

DECLARATION

When this form has been completed by a trustee or authorised official or representative of the organisation they must sign the declaration below.

This Supplemental Information sheet must be sent by e-mail to charity.administration@higgslp.co.uk or by post to: The Anthony and Gwendoline Wylde Memorial Charity c/o Higgs LLP Solicitors, 3 Waterfront Business Park, Brierley Hill, West Midlands, DY5 1LX together with the application form.

Please be advised that the Trustees do not accept applications by fax.

I confirm that the organisation will notify you about any changes to the information provided within 30 days of the change, which affects its tax residency status or which causes the information provided to become incorrect or incomplete and will complete an updated self-certification form.

Print full name:.....

I am authorised to submit this application on behalf

of:.....

Position in organisation:.....

To the best of my knowledge the information provided is correct.

Signed.....

Date.....

**THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARTIY
(Registered Charity Number: 700239)**

**APPENDIX TO GRANT APPLICATION FORM
DEFINITIONS**

The terms below are definitions of key terms referred to in this application form are taken from HMRC guidance. These definitions are intended to provide clarification and do not replace the definitions within the Common Reporting Standards.

For further information about these definitions please refer to:

HMRC's internal manual – International Exchange of Information Manual – Charities:
<https://www.gov.uk/hmrc-internal-manuals/international-exchange-of-information/ieim404700>

Financial Institution

The various UK regulations for automatic exchange of financial account information impose obligations on UK Financial Institutions to collect and maintain information about the residence, and in the case of the USA the citizenship as well, of individuals and entities for whom they maintain financial accounts. In the case of grant-making charities this includes those to whom grants are awarded. The 'wider approach' requires them to keep information in respect of all Account Holders for a period of 6 years and to report it to HMRC to the extent that it is reportable under one of the agreements.

Financial Institution means a 'Custodial Institution', a 'Depository Institution', and 'Investment Entity' or a 'Specified Insurance Company'.

i) Custodial Institution

In brief, a Custodial Institution is an entity that holds, as a substantial portion of its business, financial assets for the account of others.

In this context, a substantial portion is taken as being at least 20% of the entity's gross income that is attributable to holding financial assets and providing related financial services in the shorter of:

- Its last three accounting periods, or
- The period since it commenced business.

ii) Depository Institution

In summary, a Depository Institution is an institution that accepts deposits in the ordinary course of a banking or similar business.

HMRC will regard a person carrying out an activity in the UK that is a regulated activity for the purposes of the Financial Services and Markets Act 2000 by virtue of Article 5 of the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001 (accepting deposits) as a Depository Institution.

iii) Investment Entity

An entity will be an Investment Entity if it meets either one of the following two sets of criteria.

a) Activity Based Investment Entity

An entity will be an Investment Entity if it primarily conducts as a business for or on behalf of a customer one or more of the following activities or operations:

- Trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.);
- Foreign exchange;
- Exchange, interest rate and index instruments;
- Transferable securities;
- Commodity futures trading;
- Individual and collective portfolio management;
- Otherwise investing, administering or managing funds or money on behalf of other persons.

An entity will be regarded as primarily conducting these activities or operations as a business if its gross income from conducting these activities is at least 50% of its total gross income during the shorter of:

- The three year period ending on 31 December in the year preceding that in which its status as an investment entity is to be determined; or
- The period in which the entity has been in existence.

b) Managed Investment Entity

An entity will be an investment entity if it is managed by a Financial Institution and meets the financial assets test as described below.

An entity is managed by a Financial Institution if that Financial Institution performs, either directly or through another service provider, any of the activities described in the section above (activity based investment entity) on behalf of the entity. An entity is not regarded as managed by a financial institution if that Financial Institution does not have discretionary authority to manage the entity's assets either in whole or in part.

An entity may be managed by a mix of other entities and individuals. If one of the entities so involved in the management of the entity is a Financial Institution within the meaning of the agreements then the entity meets the requirements for being managed by a Financial Institution.

An entity meets the financial assets test if its gross income is primarily attributable to investing, reinvesting or trading in financial assets. This is a similar test to that in the section above requiring that at least 50% of its income is attributable to investing, reinvesting or trading in financial assets in the shorter of:

- The three year period ending on 31 December in the year preceding that in which its status as an investment entity is to be determined; or
- The period in which the entity has been in existence.

iv) Specified Insurance Company

A Specified Insurance Company is an entity that is an insurance company, including a holding company in an insurance group, that writes products classified as Cash Value Insurance Contracts or Annuity Contracts or makes payments with respect to such contracts.

Investment Entity Located in a Non-Participating Jurisdiction and Managed by Another Financial Institution

The term 'Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution' means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets, if the Entity is (i) managed by a Financial Institution and (ii) not a Participating Jurisdiction Financial Institution.

Financial Asset

Financial Assets are investments such as securities (stocks, shares, bonds, debentures), commodities, swaps, insurance or annuity contracts and interests in partnerships. They also include any interests in Financial Institutions or Investment Entity. They do not include direct interests in real property or cash.

Financial Account

For Investment Entities, Financial Accounts are the debt and equity interests in that entity. For charities that are trusts this will include settlors and beneficiaries of the trust (but not donors). For charities that are companies this will include shareholders and anyone else with an interest in the profits or capital of the company.

Account Holder

An Account Holder is the person who holds an account with a Financial Institution. For a charity that is an Investment Entity, and therefore is itself a Financial Institution, its Account Holders are the persons that hold its debt or equity interests, so for example the trust beneficiary or company shareholder. Trust beneficiaries include anyone who receives a distribution from the trust, whether directly or indirectly, and whether discretionary or mandatory.

Entity

Any Financial Institution or Account Holder that is not a natural person This includes companies, partnerships, trusts, foundations, associations and other legal arrangements.

An unincorporated association is an entity, even if all its members are natural persons.

Non-Financial Entity (NFE)

Any Entity that is not a Financial Institution.

Active Non-Financial Entity

A Non-Financial Entity with less than 50% of its income from Passive Income sources; a publicly traded NFE, or non-profit NFE.

A non-profit NFE is a not for profit organisation established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic or educational purposes, or as a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated for the promotion of social welfare. In all cases the organisation must be exempt from income tax and its income and assets cannot be applied other than for the express purposes for which the organisation is established.

The latter category means that all UK charities that are not financial institutions are Active NFEs irrespective of their income sources.

Passive Non-Financial Entity

Any Non-Financial entity that is not within one of the classes of active NFE. It also includes an Investment Entity within the definition of a Managed Investment Entity that is resident in a Non-Participating Jurisdiction.

Passive Income

Income from investing in assets, rather than from trading or business activities. The receipt of a program-related or social investment in the form of a grant or a loan is not considered to be passive income.

Reportable Account

An account held by an individual or Entity resident for tax purposes in a Reportable Jurisdiction. For most charitable trusts this will be the grant recipient of the charity. It also includes the Controlling Persons of a Passive Non-Financial Entity who are tax resident in a Reportable Jurisdiction.

Controlling Person

This is relevant for entities that are Passive Non-Financial Entities; it is synonymous with 'beneficial owner' and is the natural person(s) who exercise control over an entity. For companies it will include those controlling more than 25% of the company and/or its assets, or if none has such control the Senior Managing Official; for partnerships it is the partners. For trusts and similar legal arrangements it means the settlor(s), trustee(s), protector(s), beneficiary(ies) or class(es) of beneficiary; for trusts all of these natural persons must be treated as Controlling Persons, whether or not any of them actually exercises control over the trust.

Reportable Jurisdiction

A jurisdiction that has adopted the CRS and with which the UK has an agreement to exchange information.

Non-Participating Jurisdiction

Any jurisdiction that has not committed to adopt the CRS. A list of participating jurisdictions can be found at [CRS by jurisdiction - Organisation for Economic Co-operation and Development](#). A non-participating jurisdiction would be any jurisdiction not appearing on this list. Participating jurisdictions are not necessarily reportable jurisdictions. Reportable jurisdictions are those that have both enacted the CRS in domestic legislation and that the UK has agreed to exchange information with.

TIN

Tax Identification Number, or functional equivalent. In the UK this will be either a National Insurance Number or Unique Taxpayer Reference Number, where issued. A list of the TINs issued by different jurisdictions can be found at [Tax identification numbers \(TINs\) - Organisation for Economic Co-operation and Development](#).

THE ANTHONY AND GWENDOLINE WYLDE MEMORIAL CHARTIY
(Registered Charity Number: 700239)

Grant Applicant Privacy Notice

This privacy notice concerns our processing of personal information of applicants for grant funding (whether individuals or organisations) and grantees.

We, as data controller, respect your privacy and we are committed to protecting your personal information. As a grant applicant or grantee, this privacy notice will inform you how we look after your personal information when we administer grants and when we receive and consider applications for grants.

We keep our privacy notice under regular review. This version was last updated on **4 May 2022**.

About us

The Charity makes grants to and for the benefit of individuals and charitable organisations residing in the WV4, WV5, DY3, DY6, DY7, DY8, DY9, DY10 and DY11 postcodes.

The Trustees are prepared to receive a wide range of requests, provided that the applicant can show the benefits that would be derived from a grant, and that other sources of funding are not available.

How will we collect your personal information?

Personal information means any information about an individual from which that person can be identified.

We require personal information from grant applicants and grantees in order to comply with our legal and regulatory obligations, to manage the grant process and carry out our charitable aims.

We will comply with data protection law which means that when we hold personal information about you it must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and

- kept securely.

When you apply for a grant, we will collect personal information from you during the grant application process and that information will usually be provided by you directly. You may provide personal information to us when you complete application forms and when you correspond with us by post, phone, email or otherwise.

If you are an organisation applying for a grant, most of the personal information we collect will be received from the point of contact at your organisation who is responsible for the grant/prospective grant. However, we may gather additional information about your organisation and its employees and trustees for due diligence purposes and/or for the purposes of complying with our legal and/or regulatory requirements from publicly available sources such as the website of the Charity Commission of England and Wales, Scotland and Northern Ireland, your own organisation's website, Companies House, HM Land Registry and other sources relevant to your application.

We may also collect personal information about you or your organisation from other sources for example, if we request references, testimonials or letters of support.

If you provide us with personal information relating to others (e.g. your family members, your support/social workers or specifically named beneficiaries (if you are an organisation)), you must ensure that you have the necessary permissions and consents in place to allow you to lawfully disclose such data to us.

What personal information will we collect about you?

We collect, store and use the following kinds of personal information:

- **identity data** such as your title, full name, date of birth, gender, nationality, marital status, tax residency details and National Insurance number. If you are an organisation applying for a grant, we require the name and work contact details of the organisation's point of contact and we may require details of "controlling persons" i.e. beneficial owners (only relevant for entities that are passive non-financial entities);
- **contact data** such as your address, email and telephone numbers. We may also request identity and contact data for co-funders and beneficiaries (if you are an organisation), referees, your family members and dependants (if you are an individual) and any relevant support/social workers;
- **financial data** such as your bank account details, payee information and other payment details and any Gift Aid information. If you are an organisation applying for a grant, these financial details will be that of the grant recipient organisation;
- **transaction data** including details of payments and donations;
- **any other information you provide to us** in the course of the grant application process, throughout the grant period or at any other time.

How will we use your personal information?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you or to take steps at your request prior to entering into it;
- where it is necessary for the performance of tasks carried out in the public interest e.g. the disbursement of funds to organisations and/or individuals who meet our charitable objectives and criteria;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Our legitimate interest will primarily be the legitimate pursuit of our grant-making activities as a charitable entity and associated work such as managing and administering grants and maintaining a historical archive;
- where we need to comply with a legal or regulatory obligations or to comply with reporting (or other) obligations to the Charity Commission, HMRC or other regulatory body.

We will use your personal information to:

- award grants effectively and to monitor their impact and shape future grant making policy;
- provide and personalise our services;
- deal with your enquiries and requests;
- process and assess your grant application, including contacting you to discuss the application and any queries;
- administer grants and for other purposes arising in the course of our grant relationship, including ongoing contact regarding the relationship, payment, monitoring and evaluation and reporting back (including audits);
- promote grant funded work;
- maintain an archive with records of previous grants and previously supported grantees;
- to satisfy legal and regulatory obligations;
- prevent fraud;
- to establish, defend and/or enforce legal claims.

Will we share your personal information with anyone else?

Generally, we will only use your personal information and share it with third parties to the extent required to achieve the purposes set out in this privacy notice. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Relevant third parties may include:

- our trustees;
- referees whose details have been provided by you;
- suppliers and sub-contractors based in the United Kingdom for the performance of any contract we have with them – for example for IT services such as website hosting;
- insurers and professional service providers such as accountants and lawyers based in the United Kingdom;
- financial companies that collect or process donations on our behalf, and external fundraising platforms based in the United Kingdom;
- government bodies, law enforcement agencies and regulatory authorities, such as HMRC; and
- auditors or contractors or other advisors based in the United Kingdom auditing, assisting with or advising on any of our business or charitable purposes.

Our trustees will review the information you have provided in connection with your grant application, together with any additional information gathered from publicly available sources (as outlined above), in order to assess whether a grant will be made. If an award is made, we may ask for extra information about you or your organisation (as the case may be) to help us pay and monitor the award.

We also reserve the right to disclose your information to third parties for their own purposes in some cases. For example:

- if we sell or buy all or part of a business, in which case we may disclose it to the potential seller or buyer;
- if we are under a legal or regulatory duty to do so or under an obligation to the Charity Commission, HMRC or other regulatory body;
- to protect the rights, property and/or safety of the Charity, its personnel, supporters, users or others (including you).

With explicit consent, we may also publish the names of organisations and/or individuals that have received grants from us in our annual report and accounts (submitted to the Charity Commission).

What if you do not provide personal information?

You are under no statutory or contractual obligation to provide personal information to us as part of the grant application process. However, if you do not provide the information requested, we may not be able to process or consider your grant request.

Due to recent regulatory changes, we are required to confirm that any grant applicants are resident in the UK for tax purposes. We are legally required to request information about a grant applicant's tax residency and their tax identification number (or National Insurance number). Unfortunately, we will not be able to consider a grant application if this information is not provided.

International data transfers

Generally, the personal information we collect is stored at a location within the UK or EU. We use agencies and/or suppliers to process personal information on our behalf and so personal information may therefore be transferred, stored, or accessed outside the UK or EU. In these cases we take all steps reasonably necessary to ensure that appropriate safeguards are in place (for example, by entering into an agreement approved by the European Commission for this purpose). Please contact us if you would like to receive further information on the specific mechanism used by us when transferring your personal information out of the EEA.

How long will we keep your personal information?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

The period for which we will retain your data is determined by the time needed to assess your application, the duration of any grant award that may be made to your organisation, the duration of any grant management function that may arise from your application and the need to aggregate data to inform grant making policy/processes.

We retain details of grant applications and awards for 6 years to maintain a historical archive of our work for research purposes.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have also put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. Those rights are to:

- **request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- **request restriction of processing of your personal information.** This enables you to ask us to suspend the processing of your personal information in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;

- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **request the transfer of your personal information to you or to a third party.** We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- **withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Contact us (including complaints)

If you have any questions or concerns about this privacy notice or our use of your personal information please let us know by contacting us in one of the following ways:

Contact name: Kirsty McEwen

By post: Higgs LLP, 3 Waterfront Business Park, Brierley Hill, West Midlands, DY5 1LX

By email: charity.administration@higgsllp.co.uk

By phone: 0345 111 5050

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data privacy – www.ico.org.uk/global/contact-us. We are always grateful for the opportunity to resolve your concerns before you feel the need to speak to the ICO.