

CPRE Sussex Data Protection Policy and Procedures

1.0	<p>Aim of Policy</p> <p>CPRE Sussex needs to keep certain information about its trustees, members, staff, supporters, volunteers, contractors and others it does business with and comes into contact with in order to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.</p> <p>CPRE Sussex is committed to ensuring any personal data will be dealt with in line with the principles in the General Data Protection Regulations 2018 (GDPR). To comply, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection principles. This document also highlights key data protection procedures within CPRE Sussex. This policy is supplemented by the following documents which are all available at www.cpresussex.org.uk.</p> <ul style="list-style-type: none"> • Privacy Policy • Cookies Policy
2.0	<p>Key requirements</p> <p>In line with the GDPR 2018 principles, CPRE Sussex will ensure that personal data will:</p> <ul style="list-style-type: none"> • be obtained fairly and lawfully and shall not be processed unless certain conditions are met • be obtained for a specific and lawful purpose • be adequate, relevant but not excessive • be accurate and kept up to date • not be held longer than necessary • be processed in accordance with the rights of data subjects • be subject to appropriate security measures <p>The definition of ‘processing’ is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.</p> <p>There are five key principles of good data governance on which best practice is based. CPRE Sussex will seek to abide by these principles in relation to all the personal data it processes, i.e.</p> <ul style="list-style-type: none"> • Accountability: those handling personal data follow published data principles to help maintain public trust and safeguard personal data. • Visibility: data subjects should have access to the information that CPRE Sussex holds about themselves. This includes the right to have incorrect personal data corrected and to know who has had access to this data. • Consent: the collection and use of personal data must be fair and lawful and in accordance with the GDPR’s seven data protection principles. Personal data should only be used for the purposes



	<p>agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.</p> <ul style="list-style-type: none">• Access: everyone should have the right to know the roles and groups of people within CPRE Sussex who have access to their personal data and who has used this data.• Stewardship: those collecting personal data have a duty of care to protect this data throughout the data's life span.
3.0	Type of information processed
	<p>CPRE Sussex processes the following personal information: contact details of members, staff, supporters, volunteers, contractors and others it does business with and comes into contact with.</p> <p>Personal information is kept in the following forms: paper-based; excel database.</p> <p>Groups of people within the organisation who will process personal information are: trustees and staff.</p>
4.0	Policy Implementation
	<p>To meet the responsibilities under this Policy trustees and staff will:</p> <ul style="list-style-type: none">• ensure any personal data is collected in a fair and lawful way• explain why it is needed• ensure that only the minimum amount of information needed is collected and used• ensure the information used is up to date and accurate• review the length of time information is held on a regular basis• ensure it is kept safely• ensure the rights people have in relation to their personal data can be exercised. <p>CPRE Sussex trustees will ensure that:</p> <ul style="list-style-type: none">• everyone managing and handling personal information is trained to do so• anyone wanting to make enquiries about handling personal information, whether a volunteer or service user, knows what to do• any disclosure of personal data will be in line with CPRE Sussex's procedures• queries about handling personal information will be dealt with swiftly and politely.
5.0	Training
	<p>Awareness raising about GDPR and how they are to be observed within CPRE Sussex will take the following forms:</p> <ul style="list-style-type: none">• as an agenda item for CPRE Sussex Trustee meetings• in the CPRE Sussex Volunteer & Staff Handbook• at Volunteer or Supporter meetings• by the Policy being available on the CPRE Sussex website

6.0	Gathering and checking information
	<p>Before personal information is collected, CPRE Sussex will consider:</p> <ul style="list-style-type: none"> • what details are necessary for CPRE Sussex’s purposes • how long this information is likely to be needed. <p>CPRE Sussex will inform people whose information is gathered about the following:</p> <ul style="list-style-type: none"> • why the information is being gathered • what the information will be used for • who will have access to their information (including third parties). <p>CPRE Sussex will take the following measures to ensure that personal information kept is accurate:</p> <ul style="list-style-type: none"> • CPRE Sussex will send out reminders to people asking them to check their details • If no response, CPRE Sussex will judge the consequences of not keeping this information and act upon such judgement. <p>Personal sensitive information will not be used apart from the specific purpose for which permission was given.</p>
7.0	Retention periods
	<p>CPRE Sussex will ensure that information is kept according to the retention period outlined in the Privacy Policy.</p>
8.0	Data Security
	<p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures are taken:</p> <ul style="list-style-type: none"> • use of lockable cupboards with restricted access to keys • password protection on personal information files • setting up computer system to allow restricted access to certain areas • backing up database onto a server/the cloud off site <p>Any unauthorised disclosure of personal data to a third party by any person who has received such data as a result of their activities for and on behalf of CPRE Sussex may result in the termination of any post or contract that person holds with or within CPRE Sussex.</p> <p>The Trustees are collectively accountable for compliance of this policy. A Trustee could be personally liable for any penalty arising from a breach that s/he has made.</p>
9.0	Procedure in case of a breach
	<p>The procedure to be followed in case of a breach is set out in a separate procedure entitled ‘Personal Data Breach Procedures’.</p>



10.0	Subject Access Requests
	<p>Anyone whose personal information we process has the right to know:</p> <ul style="list-style-type: none">• what information we hold and process on them• how to gain access to this information• how to keep it up to date• what CPRE Sussex are doing to comply with the Act. <p>They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</p> <p>Individuals have a right to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Chair of Trustees.</p> <p>The following information will be required before access is granted:</p> <ul style="list-style-type: none">• full name and contact details of the person making the request• their relationship to CPRE Sussex. <p>CPRE Sussex may also require proof of identity before access is granted. The following forms of ID will be required: passport or birth certificate.</p> <p>Queries about handling personal information will be dealt with swiftly and politely.</p> <p>CPRE Sussex will aim to comply with requests for access to personal information as soon as possible but will ensure it is provided within the 40 days required from receiving the written request.</p>
11.0	Review
	<p>This policy will be reviewed at intervals of at the maximum 2 years to ensure it remains up to date and compliant with the law.</p>