

SEAVINGTONS' COMMUNITY LAND TRUST
[of Seavington St Mary and Seavington St Michael]

GDPR 2018 - Information Protection Policy

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Policy prepared by: the CLT Secretary

Approved by: the CLT Board

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1. Introduction

The Seavingtons' Community Land Trust (CLT) gathers limited amounts of personal information about individuals for the purpose of running the CLT.

This policy describes how we collect, handle and store this personal information in order to comply with the law and protect the information.

2. Why This Policy Exists

This information protection policy ensures that the Seavingtons' Community Land Trust:

- complies with information protection law and follows good practice
- protects the rights of the persons whose information we hold
- is open about how it stores and processes personal information
- protects the information from the risk of a information breach.

3. Information Protection Law

The General Data Protection Regulation 2018 (GDPR) define how all organisations that collect, handle and store personal information, including Seavingtons' Community Land Trust, must protect that information and the rights of the individuals concerned.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. It must also be accurate and kept up to date, and not held for any longer than necessary.

4. Policy Scope

This policy applies to all members of the Seavingtons' Community Land Trust and to anyone who is given access to personal information held by the CLT.

It applies to all personal information that the CLT holds, which can include:

- name and title of individual
- postal address
- Email address

- telephone number(s)

5. Information Protection Risks

This policy aims to protect the CLT from the following risks:

- breaches of confidentiality
- failing to offer individuals their legal rights regarding their personal information
- reputational damage in the event of an information breach.

6. Responsibilities

Seavingtons' Community Land Trust Board members all have responsibility for ensuring that the CLT collects, stores and handles data appropriately.

Each Board member must ensure that he/she handles personal information in line with this policy and data protection principles. The same requirement applies to any member given access to personal information for the purposes of the CLT.

These members have specific areas of responsibility:

- Chairman of the Board: responsible for ensuring that the CLT meets its legal obligations. For the purposes of the GDPR, the Chairman is the group Data Controller
- Treasurer: responsible for ensuring that financial and bank information is secure
- Secretary: responsible for keeping any personal data up to date and ensuring that this policy is available to members. Also responsible for dealing with requests from individuals to see what information is held about them (subject access requests).

7. General Information Handling Guidelines

The following guidelines apply to all Board members. They also apply to other members who may on occasion be granted controlled access to information for the use of the CLT

- the people normally able to access information covered by this policy are the CLT Board members

- information should not be shared informally between Board members
- the CLT will provide training to existing or new Board members or any other person who may use the data, to help them understand their responsibilities when handling information
- information should be kept secure by taking sensible precautions and following the guidelines below:
 - strong passwords must be used and never shared
 - personal information should not be disclosed to people not authorised by the Data Controller
 - information should be regularly reviewed and updated if required
 - computers holding personal information should be backed up regularly
 - information should never be saved to portable devices or removable media unless encrypted (memory sticks, laptops, smart phones, tablets, CDs, DVDs)
 - computers containing information should be protected by a firewall, anti-virus software and password
 - personal information must be encrypted before sending by Email
 - paper copies of personal information must be kept secure, and destroyed (burnt or shredded) when no longer required
 - Members leaving the Committee must erase all personal information held by them using an erasure tool and destroy any paper copies.

8. Information Retention

The following are guidelines for information retention:

- information will be retained for 5 years following the departure of a member from the CLT unless that member requests their data be erased earlier.

9. Subject Access Requests

All individuals who are the subject of personal information held by the Seavingtons' Community Land Trust are entitled by law to:

- ask what information we hold about them
- ask how to gain access to it
- be informed how to keep it up to date
- be informed how the CLT is meeting its information protection obligations
- request that their personal information is erased.

Requests should be made by Email to the secretary Seavingtons' Community Land Trust (CLT@theseavingtons.org). The Secretary will aim to provide the relevant information within 28 days. The subject's identity will be confirmed before any information is released.

10. Disclosure for other Reasons

In certain circumstances the law allows personal information to be disclosed to law enforcement agencies without the consent of the information subject. In this event, the Data Controller will ensure that the request is legitimate and seek legal guidance where necessary.

11. Information Breaches

In the event of an Information Breach, the Seavingtons' Community Land Trust will assess the risk to individuals and contact them if appropriate. Contact will be made within 72 hours. In certain circumstances the CLT may be required to inform the Information Commissioner's Office of a breach, also within 72 hours (ico.org.uk).