



# **Angmering Community Land Trust**

## **POLICY**

# **DATA PROTECTION POLICY**

Community Benefit Society No. 7201

Registered Address: ACLT, c/o Angmering Community Centre, Foxwood Avenue, Angmering BN16 4FU

Reviewed September 2021

This policy will detail how, when and why we collect Personal Information about you and how we will use it. Personal information is data that identifies an individual and all such data will be dealt with properly and in accordance with the General Data Protection Regulation (GDPR) and other related legislation.

We collect and use certain types and amounts of personal data about people depending upon the specific activities they engage in with us, such as registering to become an ACLT member, subscribing to a community share offer, becoming a Board Member or expressing an interest in an ACLT home.

You may have given us your personal data by filling in forms, by corresponding with us by phone, email or letter. Whatever your involvement with us will result in personal data being created. This could be just your name and basic contact details.

Data classed as "sensitive" is in a special category. ACLT does not intend to seek or hold sensitive personal data about members or clients except where it has been notified of the information for the benefit of the client (e.g. physical or mental health.)

### **Six Principles of Data Protection:**

The six Data Protection principles which must be followed are: -

- I. Personal data must be processed fairly, lawfully and in a transparent manner
- II. Personal data will be collected only for specific, explicit and legitimate purposes
- III. Personal data shall be adequate, relevant and limited to what is necessary for the purpose for which it is being collected
- IV. Personal data shall be accurate and kept up to date with records regularly reviewed
- V. Personal data shall not be kept for longer than necessary and will be disposed of in a secure manner
- VI. Personal data shall be processed in such a way that ensures appropriate security.

Anyone dealing with personal data must be mindful of the individual's rights under the law.

### **Board Members**

In order to comply with ACLT Rules and the Statutory and Regulatory obligations and responsibilities, we may collect the following personal data from our Board Members:

- Name, address and full date of birth
- Current Employer and job title
- Land and property holdings within one mile of the boundary of any potential ACLT scheme
- Your current and intended involvement in other organisations and activities including any directorships or controlling interests in other businesses and organisations
- Your skills and experience so that we can assess what contribution you can make to the Board

The above data will be held by us for the period of your membership of the Board and for 6 years after your resignation or removal from the Board. The record of your name and membership is kept indefinitely.

### **Ordinary/ Shareholder Members**

We use the personal data you provide as a member to maintain our membership database as required by law and ACLT Rules, and to service your membership such as sending newsletters (subject to your contact preferences e.g. Newsletters etc.) and notices of our Annual General Meetings. To reduce unnecessary costs, this will normally be done by email.

The above data will be held by us for the period of your membership and for 6 years after your resignation.

### **Personal Data provided by Applicants for ACLT Homes**

People who are interested in applying for a home are required to complete an Expression of Interest.

Nearer the time houses are to become available they will be asked to fill in a much more detailed Application Form. Individuals will be informed as to the purpose of collecting any information from them.

There will be a high demand for our homes and we shall do all we can to ensure that they are allocated fairly to those who are most in need in accordance with our Housing Allocations Policy, a copy of which can be found on our website. If you apply for a home you will have to provide us with:

- Name, Address and Contact details
- Personal ID for all members of the household (e.g. birth certificate, passport, driving licence etc.)
- Personal data in relation to children will not be included. If you apply for a home we will need to hold a record of the children in your household (names, sexes and ages) as part of your application papers. These details will not be copied to any other databases or shared with external agencies except for a specific purpose and with your prior written or e-mailed consent
- Proof of responsibility for any children in the household (e.g. Child Benefit)
- Proof of current address, for all members of the household (e.g. Utility bills etc.)
- Information and supporting evidence about your current and previous homes (Copy of Tenancy Agreement, where applicable; Completion Statement if the property was sold in the last 5 years)

Financial information:

- Proof of income and savings (e.g. bank statements / wage slips)
- Proof of welfare benefits
- Proof of Right to Reside in the UK.

We may also process sensitive classes of information such as physical or mental health issues when – as stated earlier- a client has requested that this is taken into account in their application.

**Why do we collect your information?**

Your information is used to:

- Understand and determine your housing status and needs
- To enable us to assess your housing application
- To enable us to confirm your identity when talking with you about your application

***N.B. Personal data is kept secure using technical security measures for our IT systems. We will delete your data securely and only keep it for as long as necessary.***

*Data in application papers is only disclosed on a “need to know” basis to those involved in the allocation process where it is necessary for them to carry out their duties. They already have duties of confidentiality as Board Members of ACLT. Copies of application papers are printed out for the panel but are destroyed immediately after the panel meetings*

**Successful Applicants**

If your application for a home is successful and you become one of our tenants, we will hold your application papers and details of the outcome of your application for the whole of the time that you remain one of our residents (or 6 years from the allocation of the home to you, if longer) If the relationship with ACLT is of a financial nature, we will keep information for a minimum of 7 years.

**Unsuccessful Applicants**

If your application for a home is unsuccessful, we will let you know of the outcome and ask whether you wish us to keep your application papers for up to two years in case a home comes up for reallocation. At the end of the two-year period -or within 6 months of your decision that you do not wish to stay on the waiting list, we will destroy your application papers and all electronic records of your application and keep just a record of the date of your application and your name and the fact that you were unsuccessful.

If you appeal against our decision not to allocate you a home we will keep all your application papers until the date 2 years after your last communication with us.

The lawful basis for processing your personal information is consent. You will have been asked for your consent to the processing of your personal data for one of the specific purposes given above.

**Our policy is to protect the confidentiality of the data we possess and contain within our systems.** We will use strict procedures and security features – a combination of software and hardware devices to guard against unauthorised and malicious access.

We shall not share your information with other organisations – other than service providers (third parties) working on our behalf (e.g. Housing Associations) in which case your prior consent would need to be given for this data sharing and any personal information would be on a need -to-know basis only in order to deliver a service.

We might be required to share information with

- Financial or other Regulatory Organisations
- Police Services
- Local or Central Government

### **Subject Access Requests**

You have a right to access – to know what information we hold on you in electronic or manual files and to request a copy in a portable format. This request must be made in writing.

### **Right to Erasure of Data (to be “forgotten”)**

You also have a right to be forgotten. You can ask that your data be deleted, and all trace be removed if you revoke your membership and there are no statutory conditions in place.

- If no longer necessary for the purpose for which it was collected
- If consent has been withdrawn

Our **Data Protection Officer** (DPO) is our Board Secretary who will investigate and make decisions on all the above and if necessary notify any breach of GDPR to the Information Commissioner’s Office (ICO) giving details of the breach and the measures taken / proposed to address this.

**Privacy Notice**

This privacy notice tells you about how Angmering Community Land Trust collects and uses personal information for the purposes of the allocation of our affordable housing.

**What information do we collect?**

Angmering Community Land Trust collects the following information from housing applicants and members of their household: name, date of birth, current and former addresses, phone and email contact information, financial information and your housing & support needs.

ACLT does not intend to seek or hold sensitive personal data about clients except where it has been notified of the information for the benefit of the client.

We will obtain your authority and consent to contact third party organisations and for them to disclose information to us for this purpose.

**Why do we collect your information?**

Angmering Community Land trust uses this information to:

- Understand and determine your housing status and needs
- Assess your housing application in line with the set Criteria
- Advise Arun of met housing needs
- Ensure your needs are understood and met
- Enable us to confirm your identity when talking to you about your housing application

**How do we keep personal information secure?**

Angmering Community Land Trust ensures that personal data is kept secure through the use of technical security measures for our IT systems. We ensure that data is only disclosed on a “need to know” basis to those involved in our allocation process.

**How long do we keep hold of personal information?**

Records will not be kept for longer than necessary and we will delete your data securely. Full information regarding retention periods for data can be found in our Housing Allocation Policy on our website.

**Access to personal information**

You have the right to know if Angmering Community Land Trust holds any personal information relating to you. You will usually be entitled to see all the data held about you but may not be entitled to see confidential information about other people.

If you are unhappy with the way your personal information is being handled you can contact the Independent Information Commissioner at [www.ico.org.uk](http://www.ico.org.uk).

**Please return a copy of this letter to acknowledge receipt of this notification with the attached reply slip signed and giving your permission to hold your data.**

To ACLT, c/o Angmering Community Centre, Foxwood Avenue, Angmering, BN16 4FU

I have received the Trust’s Privacy Notice. I understand the need for data to be collected and held to enable a fair assessment of our need.

Signed: .....

Print Name.....Date .....