

BOURNEMOUTH EAST ALLOTMENT SOCIETY LTD

DATA PROTECTION POLICY

First adopted on 16th April 2012; ratified at AGM on 9th December 2012

Last reviewed 13th October 2021 and ratified at the AGM on 9th December 2021

The policy will be reviewed at three yearly intervals or sooner if new guidance is issued.

1. BACKGROUND INFORMATION

Originally registered as a Friendly Society in 1935 under the Industrial and Provident Societies Act (1893), Bournemouth East Allotment Society Ltd was re-registered in 2018 under the Co-operative and Community Benefit Societies Act 2014. It is affiliated to the National Allotment Society, previously the National Society of Allotment and Leisure Gardeners Ltd. The allotment sites are leased from Bournemouth, Christchurch & Poole Council and managed by an elected committee.

Data held: BEAS Ltd holds personal data on its members, associate members and applicants for plots/membership. This information is held electronically (computerised records) and manually. The data held is only that which is relevant to the administration of the Society.

Data Controller: The Data Controller is the Secretary.

2. POLICY DEVELOPMENT

The policy was originally adopted by the Committee on 16th April 2012 and circulated to all members and associate members with the June edition of the newsletter. It was re-drafted in line with the General Data Protection Regulation (GDPR), effective 25th May 2018 and has been reviewed subsequently.

3. INTRODUCTION

BEAS seeks to abide by the Data Protection Act, 2018 which came into force on 25th May 2018 to implement the EU General Data Protection Regulation. This regulates both the storage and processing of personal data.

BEAS understands Personal Data to be information which relates to a living individual (Data Subject) who can be identified from that information. BEAS does not currently hold any Sensitive Data i.e. data that indicates an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions (except where members have indicated their short-term incapacity affecting their ability to cultivate their plot), sexual life or sexual orientation, commission, allegation, proceedings or sentencing arising from criminal offences, genetic data or biometric data.

BEAS understands the processing of data to include the obtaining, recording, holding, storing, retrieving, using, amending (if requested by the member), sharing (only by the Committee for the Society's purposes), erasing and destroying of that data. Titles, names, addresses, telephone numbers and email addresses held by the Society are shared with the National Allotment Society (NAS) annually on the payment of the Society's subscription as a full member of NAS, thus recording the Society's members as affiliated members of NAS.

BEAS understands that under GDPR, personal data must be:

- Processed fairly, lawfully and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Must be adequate, relevant and limited to what is necessary for the purpose.
- Accurate and up to date.
- Not kept longer than is necessary
- Processed in a manner which ensures security of that personal data against unlawful processing, accidental loss, destruction or damage.

4. ENSURING THAT PERSONAL DATA IS ADEQUATE, RELEVANT AND PROTECTED

In line with the General Data Protection Regulation (which came into effect in the UK in May 2018) the Society will collect the following personal data for each Member, Associate Member and Applicant:

- Title;
- First name;
- Surname;
- Address;
- Telephone number(s) and
- Email address.

This will be collected under the following legal grounds:

- Necessity for the performance of a contract with the data subject(s) i.e. the Society's Tenancy Agreement or Associate Membership
- By the consent of the individual i.e. given in an application for tenancy/membership.

BEAS will take every precaution to ensure that all personal information held by the Society is secure. Data that is held electronically is password protected and access is strictly limited to those who need to use it e.g. names and addresses or email addresses will be used for correspondence and the circulation of the newsletter; telephone numbers for urgent messages, or for shop helpers to be able to swop duties. All Tenancy Agreements, correspondence, plot applications or other documents held in paper format is stored securely on the Society's premises.

5. WHO MUST COMPLY WITH THIS POLICY

All officers and committee members of BEAS Ltd must comply with this policy.

6. ROLES AND RESPONSIBILITIES

The Data Controller: is responsible for ensuring that

- all data is kept up-to-date and is stored securely;
- members and associate members know how their data may be used and when it may be shared;
- data is shared only on a need to know basis;
- all data is shredded or permanently deleted once it is no longer needed;
- the office computer is "cleaned" if it is no longer being used by BEAS Ltd.

The Committee: is responsible for destroying any data that has been shared as soon as it has been used for the purpose for which it was requested.

Members and Associate Members: are responsible for ensuring that they inform the Data Controller (Secretary) if their personal information changes e.g. they change address. Any individual can request:

- a copy of their personal data;
- an amendment to their personal data;
- the removal of their personal data (but not where the Data Subject still holds a Tenancy Agreement).

This may be requested from the Data Controller at any time, but reasonable time must be allowed for the Data Controller to respond to the request. The request must be in writing.

7. MONITORING, EVALUATION AND REVIEW

The policy will be monitored through:

- Requests for or amendment to personal data;
- Complaints relating to personal data.

The effectiveness of the policy will be evaluated by the Committee on an annual basis using the evidence gathered through the monitoring process.

The policy will be reviewed at three-yearly intervals.

8. DISSEMINATION OF THE POLICY

This policy will be made available to all Members, Associate Members and Applicants.