

Data Protection Policy

Introduction

This Data Protection Policy is the overarching policy for data security and protection for Energise Sussex Coast, a community benefit co-operative and a registered Company number IP031639.

The General Data Protection Regulation (GDPR), as supplemented by the Data Protection Act DPA 2018 (DPA), is the main piece of legislation that governs how an organisation collects and processes personal data.

Energise Sussex Coast is committed to ensuring that any personal and confidential data stored and utilised in the course of its work is handled appropriately and securely and is not shared without consent unless the organisation has a legal obligation to disclose personal data it holds.

Energise Sussex Coast is registered as a data controller with the Information Commissioner's Office (registration number: ZB396587).

Purpose

This Data Protection Policy sets out how Energise Sussex Coast will process the personal data of its staff, volunteers, clients, and other third parties (i.e. data subjects).

Examples of personal data held by Energise Sussex Coast:

- Householder data held for home insulation scheme works.
- Householder data held for case work and energy advice, including health and finance.
- Personal data held for community-based projects.
- Personal and confidential data held for analysis in research projects.
- HR and finance information.

Scope

This Data Protection Policy includes in its scope all data which Energise Sussex Coast processes either in hardcopy or digital copy. This includes special categories of data.

This Data Protection Policy applies to all staff, including temporary staff, volunteers, and contractors. Energise Sussex Coast ensures that where it engages a third party to process data on our behalf that they operate within the requirements of the General Data Protection Regulations.

GDPR principles

The GDPR is based on a set of core principles that Energise Sussex Coast must observe and comply with at all times from the moment that personal data are collected until the moment that personal data are archived, deleted or destroyed.

Energise Sussex Coast must ensure that all personal data are:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is to be processed.
4. Accurate and where necessary kept up to date.
5. Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed.
6. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage

Data security, integrity and confidentiality

The personal data that Energise Sussex Coast collects and processes must be secured by appropriate technical and organisational measures against accidental loss, destruction or damage, and against unauthorised or unlawful processing. The measures in place must ensure that confidentiality, integrity and availability of personal data are maintained at all times:

- **Confidentiality:** means that only people who need to know and are authorised to process any personal data can access it
- **Integrity:** means that personal data must be accurate and suitable for the intended purposes
- **Availability:** means that those who need to access the personal data for authorised purposes are able to do so

Consent as a lawful basis for processing

In order for a data subject's consent to be valid and provide a lawful basis for processing, it must be:

- **Specific** (not given in respect of multiple unrelated purposes)
- **Informed** (explained in plain and accessible language)
- **Unambiguous and given by a clear affirmative action** (meaning opt-in: silence, inactivity or pre-ticked boxes will not be sufficient)
- **Separate and unbundled from any other terms and conditions provided** to the data subject
- **Freely and genuinely given** (there must not be any imbalance in the relationship between the organisation and the data subject and consent must not be a condition for the provision of any product or service)

A data subject must be able to withdraw their consent as easily as they gave it.

Once consent has been given, it will need to be updated where the organisation wishes to process the personal data for a new purpose that is not compatible with the original purpose for which they were collected.

Data protection procedures in place

Energise Sussex Coast recognises that whilst the liabilities under the GDPR rests with its Directors, all staff, its volunteers, and contractors also have responsibilities to ensure that its systems and processes are robust. Measures in place to achieve compliance include, for example, incorporating data protection as a topic into induction for new staff and volunteers and a checklist is used for each new project during the setup stage to ensure that any data

collected, stored or used during the course of the work is managed in line with the principles set out within this policy. A standard clauses in contracts to ensure that appropriate data protection responsibilities and practices are clearly established requirements for members of staff and sub-contractors.

Data subject requests

Energise Sussex Coast has adopted the GDPR Principles to ensure that we are following best practice in how we use our client's data. The Principles are:

1. The right to be informed
2. the right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object

A data subject is defined as an individual to whom personal data relates and who can be identified or is identifiable from personal data held by an organisation. A data subject has the right to request to see the information we hold about them and to request that their data is deleted. These are called data subject data requests.

Data subjects may request that their data is provided to another named organisation. Energise Sussex Coast will respond in a timely manner to any requests it receives or advise t about any issues which may cause a delay.

Submitting a data subject request: please email hello@energisesussexcoast.co.uk
A copy of an original identification document (e.g. a passport or a birth certificate) is required to be supplied with the request.

Reporting personal data breaches

Energise Sussex Coast has put in place appropriate procedures to deal with any personal data breach. In certain circumstances, the GDPR will require Energise Sussex Coast to notify the regulator and its data subjects of any personal data breach.

Suspected occurrences of a personal data breach must be immediately reported to and advice sought by emailing hello@energisesussexcoast.co.uk

Further information

Further information is available from the Information Commissioner's Office (ICO), website: <https://ico.org.uk>.

Contact

Get in touch with Energise Sussex Coast by emailing: hello@energisesussexcoast.co.uk

Document control

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