



# Kennett CLT Privacy Policy

Kennett Community Land Trust is a Community Benefit Society registered with the FCA under number 7443, registered office 66 Station Road, Kennett, Newmarket CB8 7QF

## **Privacy Policy**

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

This policy applies if you're a member of Kennett CLT, visit our website, email, call or write to us.

We'll never sell your personal data and will only share it with our external advisers and organisations we work with when it's necessary and when the privacy and security of your data is assured, or when we are required by law to share it with our regulatory body (currently the FCA), the police or other official bodies.

### **Who Are 'We'?**

In this policy, whenever you see the words 'we', 'us', 'our', it refers to Kennett CLT, a community benefit society registered with the FCA under number FCA 7443, Registered office 66 Station Road, Kennett, CB8 7QF.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to The Secretary, 66 Station Road, Kennett, CB8 7QF

### **What Personal Data Do We Collect?**

We collect different types and amounts of personal data about you depending on the specific activities you engage in with us, such as registering to become a CLT member, volunteering or donating, or applying for a CLT home.

You may have given us your personal data by filling in forms on our website, by corresponding with us by phone, email or letter or by signing up in person at one of our member drives.

### **Personal Data Created by Your Involvement with Us**

Your activities and involvement with us will result in personal data being created. This could include your name and basic contact details, and details of how you've helped us by volunteering or being involved with our campaigns and activities.

If you decide to donate to us then we'll keep records of when and how much you give and whether it was linked to a particular purpose, and details of how you paid (but not your credit or debit card or direct debit details), and whether your donations are gift-aided.

If you're a volunteer then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal or contractual reasons for a period of 6 years after you stop volunteering with us, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

If you make any general complaint to or about us, we will keep full details of your name and your complaint for 6 years from the last communication we receive in respect of your complaint.

## **Personal Data Held in Respect of Applicants for Membership**

When you apply to become a member, you will be asked for your name, email, postal address, telephone. We are obliged by law and our Rules to hold this information on our membership database for as long as you remain a member.

If you tell us you wish to cease being a member, or on the termination of your membership for any other reason under our Rules, we will delete your contact details and all other information we hold about you apart from your name, the date you became a member and the date and means by which you ceased to be a member.

## **Personal Data Provided by Applicants for Homes**

There is a high demand for our homes and we do all we can to ensure that they are allocated fairly to those who are most in need. Pursuant to our allocations policy (a copy of which can be obtained from our Secretary), if you apply for a home you will have to provide us with:

- All the details that we hold for all our members (see above);
- Proof of identity (tenancy agreement, proof of address, birth certificate);
- Personal data for the other members of your household (in relation to children, see further below);
- Information and supporting evidence about your current and previous homes;
- Financial information (proof of income and capital e.g. bank statements or wage slips);
- Your current and intended involvement in community organisations and activities;

We will also keep with your application papers information collected from your referees and at interview.

If your application for a home is successful and you become one of our residents, we will hold your application papers and details of the outcome of your application for the whole of the time that you remain our resident (or 6 years from the allocation of the home to you, if longer).

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 that two year period, or within six 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, your name, the number of adults and children in your household at the time of your application and the fact that your application was unsuccessful.

If you appeal against our decision not to allocate you a home or threaten any legal or political action against us as a result of that decision, we will keep all your application papers until the date 2 years after your last communication regarding our decision or after the outcome of any such action that you may start. We will then destroy all of your application papers but may keep a record of your name and details of the grounds of your appeal or complaint and the steps taken by us and by external bodies for a further 4 years.

## **Personal Data Held About Board Members**

In order to comply with our Rules and statutory and regulatory obligations and responsibilities, we collect personal data, including 'sensitive' personal data, from our Board members. Such data can include, but isn't limited to:

- Name, address and full date of birth;

- Current employer and job title;
- Your current and intended involvement in other organisations and activities and any directorships or controlling interests in other businesses and organisations;
- Your skills and experience and contribution to the Board;
- Evidence of bank account for expenses payments and records of expenses claims;
- Your opinions and attitudes about Kennett CLT, activities and interests, and your experiences of Kennett CLT;
- information relating to health, racial or ethnic origin, and criminal convictions

This 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. A record of your name and period of Board membership will be kept indefinitely.

### **Sensitive Personal Data**

At times we'll collect sensitive personal data for Equal Opportunities monitoring, as well as to check whether we treat everyone fairly, but this is only ever analysed at an aggregate level. Sensitive data including detailed personal and financial information has to be collected by us in respect of applications for homes in order to ensure that we are acting in accordance with Kennett CLT's object of providing affordable homes to those most in need of them. The holding of such data by Kennett CLT is described elsewhere in this policy.

### **Children's Personal Data**

Even though our staff may meet and get to know your children at social events, they will not include any personal details of your children in Kennett CLT's records.

We sometimes take photographs of children for publicity purposes. We will always give parents and guardians the opportunity to opt out of having their photographs taken and / or published and we will not publish pictures of those under 13 without the consent of the parent, guardian, school or youth organisation.

If you apply for a home, we will hold a record of the children in your household (their names, sexes and ages) as part of your application papers. These details will not be copied to any other of our databases or shared with our external advisers except for a specific purpose and with your prior written or e-mailed consent.

We won't send marketing emails, letters or make calls to people under the age of 13. We will not send any marketing communications requesting donations to young people aged between 13 and 17 and won't profile anyone under the age of 18.

### **Use of Photographs**

By attending our events you are assumed to be consenting to us using your image in any group or crowd photos or videos taken at those events. We may use the photos or videos on our website or in printed or electronic newsletters, reports or publicity materials. Please let us know at the event if you do not wish to be included in any photos or videos. We will not use photos or videos that feature you by yourself, nor will we name you in any captions, unless you have given us general or specific written consent to do so.

### **How We Use Your Personal Data**

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

To the extent not already described in the policy above, personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data to them.

Your personal data may be collected and used to help us deliver our activities, help us raise funds, or process your request for membership or application for a home. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, websites and activities.

### **Marketing Communications**

We'd like to use your details to keep in touch about things that may matter to you.

If you choose to hear from us we may send you information based on what is most relevant to you or things you've told us you like. We may also show you relevant content online. This might be about volunteering with us, membership, events, fundraising, our home allocations/offers process and opportunities and information on new sites and campaigns.

We'll only send these to you if you agree to receive them and we will never share your information with companies outside Kennett CLT for inclusion in their marketing. If you agree to receive marketing information from us you can change your mind at a later date.

However, if you tell us you don't want to receive marketing communications, then you may not hear about events or other work we do that may be of interest to you.

### **How can I change my contact preferences?**

We'd love to stay in touch, but we don't want to out-stay our welcome. Choose how you would like us to get in touch with you by notifying us at For example, you can send a simple email ([hello@kennettclt.org](mailto:hello@kennettclt.org)) or a letter to the Secretary saying, "I would like to stay in touch via your regular newsletter" and we'll keep you updated on events and news relevant to you – straight into your inbox or via post.

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a member or applicant/resident of Kennett CLT. Examples are:

- Confirmation of the outcomes of your application to be a Kennett CLT resident,
- Confirmation of your membership applications,
- Membership-related mailings such as notice of our Annual General Meetings.

### **Membership**

We use the personal data you provide as a member to maintain our membership database as required by law and our Rules, and to service your membership such as sending newsletters (subject to your contact preferences) and notices of our Annual General Meetings.

### **Fundraising, Donations and Investments**

If you make a donation or investment, we'll use any personal information you give us to record the nature and amount of your gift, claim gift aid where you've told us you're eligible and thank you for your gift. If you interact or have a conversation with us, we'll note anything relevant and store this securely on our systems.

If you tell us you want to fundraise to support our cause, we'll use the personal information you give us to record your plans and contact you to support your fundraising efforts.

If you've told us that you're planning to, or thinking about, leaving us a gift in your will, we'll use the information you give us to keep a record of this – including the purpose of your gift, if you let us know this.

If we have a conversation or interaction with you (or with someone who contacts us in relation to your will, for example your solicitor), we'll note these interactions throughout your relationship with us, as this helps to ensure your gift is directed as you want.

### **Major Donors/Investors**

Our regulatory rules require us to know the source of any funds we receive and any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors and investors who've made, or are about to make, a significant donation to or investment in Kennett CLT.

As part of this process we'll carry out research using publicly available information and professional resources. If we have to ask you for more information that is not in the public domain, we'll give you a bespoke privacy notice with further details of how we will look after your data.

### **Management of Volunteers**

If you volunteer with us, we need to use your personal data to manage your volunteering, from the moment you enquire to the time you decide to stop volunteering with us. This could include: contacting you about a role you've applied for or we think you might be interested in, expense claims you've made, shifts you've booked and to recognise your contribution.

### **Research**

We carry out research with our members, staff and volunteers to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

We may give some of your personal data (e.g. contact information) to a research consultant or organisation who will carry out research on our behalf. This will always be an organisation who shares our values and has been procured using formal due diligence procedures.

## **Personal Data Provided by Applicants for Homes**

In order to fulfil Kennett CLT's objects of building affordable homes and creating sustainable communities, we collect and process data, including sensitive personal data, from applicants for our homes to ensure compliance with our allocations policy.

Data in application papers is only disclosed on a "need to know" basis to those involved in the allocations process, all of whom already have duties of confidentiality as Board members of Kennett CLT or sign an undertaking to keep all personal data disclosed in this way confidential.

Discussions of issues relating to individual applications at sub-committee and Board meetings are anonymised so far as possible, and the applicant's consent is obtained before any aspect of their application or their data is shared or discussed with external bodies such as the local authority. Copies of application papers are printed out for interview panels but are destroyed immediately after the panel meetings. Interview panel members are made aware of the need for complete confidentiality.

## **Safeguarding of Financial and Sensitive Data**

Financial data collected on payment of the £1 membership subscription is kept secure.

Application papers including detailed personal and financial information compiled in respect of applicants for homes are kept secure on our electronic database, which is accessible only by the Kennett CLT data controller unless express access is granted, requiring two-step verification access.

Your privacy is important to us, so we'll always keep your details secure and make sure our Trustees and professionals to whom your data is passed have promised to look after them as well.

## **Recruitment and Employment**

In order to comply with our contractual, statutory, and management obligations and responsibilities, we process personal data, including 'sensitive' personal data, from job applicants and employees.

Such data can include, but isn't limited to, information relating to health, racial or ethnic origin, and criminal convictions. In certain circumstances, we may process personal data or sensitive personal data, without explicit consent. Further information on what data is collected and why it's processed is given below.

### **Contractual responsibilities:**

Our contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll, bank account, postal address, sick pay, leave, maternity pay, pension and emergency contacts.

### **Statutory responsibilities:**

Our statutory responsibilities are those imposed through law on the organisation as an employer. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax, national insurance, statutory sick pay, statutory maternity pay, family leave, work permits, equal opportunities monitoring.

### **Management responsibilities:**

Our management responsibilities are those necessary for the organisational functioning of the organisation. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment, training and development, performance, absence, disciplinary matters, e-mail address and telephone number.

### **Sensitive personal data about employees:**

The Act defines 'sensitive personal data' as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health, sexual life, and criminal allegations, proceedings or convictions. In certain limited circumstances, we may legally collect and process sensitive personal data without requiring the explicit consent of an employee.

(a) We will process data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and, where necessary, consent.

(b) We will process data about, but not limited to, an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

(c) Data about an employee's criminal convictions will be held as necessary.

Disclosure of personal data on employees to other bodies: In order to carry out our contractual and management responsibilities, we may, from time to time, need to share an employee's personal data with one or more third-party supplier. To meet legal requirements relating to the employment contract, we are required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs. To fulfil our statutory responsibilities, we're required to give some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.