

## 1: Policy Title: Data Protection

### 2: Policy Aim:

2:1: Low Carbon Gordano (LCG) is exempt from notification with the Information Commissioners Office because it is a small, not for profit organisation handling limited data.

2:2: However it is important for the reputation of LCG that it acts in accordance with the principles of the Data protection Act 1998.

2:3: The aim of this policy is to ensure that LCG does comply with the good practice principles of the Act as measured by setting a target of having no successfully upheld complaints to the LCG Board.

### 3: Policy Approach:

3:1: The Act sets out eight protection principles which require data to be:

- **fairly and lawfully processed**
- **processed for limited purposes**
- **adequate, relevant and not excessive**
- **accurate**
- **not kept for longer than necessary**
- **processed in accordance with the data subjects rights**
- **secure**
- **not transferred to countries outside the EEA without adequate protection**

3:2: These principles are reflected in the following good practice checklist:

QUESTION	YES	NO
Do I really need this information about an individual?	Proceed	Don't collect it
Do I know what I am going to use it for?	Proceed	Don't collect it
Do the people whose information I hold know that I have got it and they are likely to understand what it will be used for?	Proceed	Inform them
If I am asked to pass on personal information, would the people about whom I hold information expect me to do this?	Proceed	Ask them first
Am I satisfied that the information is being held securely, whether it's on paper or on computer and what about my website – is that secure?	Proceed	Take practical measures to improve data security
Is access to personal information limited to those with a strict need to know?	Proceed	Restrict access
Am I sure that the personal information is accurate and up to date?	Proceed	Check accuracy
Do I destroy personal information as soon as I have no more need of it?	Proceed	Edit data

Have I trained my staff in their duties and responsibilities under the Act and are they putting these into practice?	Proceed	Provide training and monitor performance
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**4: Policy Deployment:**

- 4:1: All LCG post holders, whether they are paid or unpaid, must comply with the good practice as outlined in section three above.
- 4:2: Any complaint from an LCG data subject shall be directed to the Chairman of the Board unless that person is part of the complaint in which case it will be referred to the Company Secretary
- 4:3 The Board Chairman (or Company Secretary) will appoint a director of LCG or an independent third party with the agreement of the complainant to investigate the complaint and report their findings to the next available Board meeting.
- 4:4 The decision of the Board will be final and will be communicated to the complainant immediately.

**5: Policy Review:**

- 5:1: This policy will be amended as necessary in the light of experience following any complaints in order to improve practice.
- 5:2 Notwithstanding the above, the policy will be reviewed annually to ensure that it is up to date and still fit for purpose and that good practice standards are being maintained.
- 5:3: Any changes to the policy must be approved by the Board.

**6: Useful Appendices:**

- Information Commissioner’s Office – “A brief guide to data protection for small businesses.”
- Information Commissioner’s Office – “Personal information online small business checklist.”

Approved by the Board on 16.12.11.