

Common Ground Suffolk

Privacy Policy

How We Collect, Use, and Protect Your Personal Data

Version: 1.0

Date adopted: [Date to be inserted]

Date of next review: [Date to be inserted — recommended annually]

Data Controller: Common Ground Suffolk

Registered address: [Address to be inserted]

Contact for data protection enquiries: [Email address to be inserted]

ICO registration number: [To be inserted upon registration]

This policy applies to all personal data collected and processed by Common Ground Suffolk in connection with its activities. It covers members, volunteers, beneficiaries, and partner organisations. It should be read alongside the Society's Safeguarding Policy and Code of Conduct.

1. Who We Are

Common Ground Suffolk is a community benefit society registered under the Co-operative and Community Benefit Societies Act 2014. Our primary purpose is to advance food security and climate resilience in Suffolk and surrounding areas through community growing activities, volunteer support, and the provision of growing infrastructure.

We are the data controller for all personal data we collect in connection with our activities. This means we are responsible for deciding how and why your personal data is used, and for ensuring it is handled lawfully and securely.

We are registered with the Information Commissioner's Office (ICO) as a data controller. Our ICO registration number is set out at the top of this policy. If you have any questions about how we handle your personal data, please contact us using the details above.

2. The Legal Framework

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. These laws give individuals rights over their personal data and place obligations on organisations that collect and use it.

Under UK GDPR, we must have a lawful basis for processing personal data. The lawful bases we rely on are explained in Section 4 of this policy. Where we process special category data, which includes health information and information about disability, we must also satisfy an additional condition under UK GDPR Article 9, which is also explained in Section 4.

We will never sell your personal data to third parties or use it for purposes unrelated to the Society's objects and activities.

3. What Personal Data We Collect

3.1 Members

When you become a member of Common Ground Suffolk we collect:

- your full name
- your home address
- your email address
- your telephone number
- your date of birth (to verify you meet the minimum age requirement)
- your shareholding information including the number of shares held and transaction history
- the date you became a member
- records of your attendance at general meetings
- any correspondence between you and the Society
- bank or payment details where relevant to share transactions

3.2 Volunteers

When you register as a volunteer we collect:

- your full name
- your home address
- your email address
- your telephone number
- your date of birth
- details of your skills, experience, and availability
- references provided on your behalf
- DBS check information where applicable

- records of your volunteer activity including dates, locations, and sessions attended
- any training records relevant to your volunteer role
- emergency contact details

3.3 Beneficiaries

When we provide services to individuals who are not members we may collect:

- your full name
- your address and details of your growing space
- your contact details
- relevant information about your needs or circumstances that helps us provide appropriate support
- records of the support provided to you
- where relevant, health or disability information to ensure our support is appropriate and safe

3.4 Special Category Data

Special category data is a category of particularly sensitive personal data that receives extra protection under UK GDPR. We may collect the following special category data in connection with our activities:

- health information, including information about disability, mobility limitations, or medical conditions, where this is relevant to the support we provide or to safeguarding
- information about mental health conditions where relevant to the support we are providing
- DBS check results, which may reveal criminal convictions or cautions

We only collect special category data where it is strictly necessary for the purposes set out in this policy and we handle it with the highest level of care. Further detail on how we use this data and our legal basis for doing so is set out in Section 4.

3.5 Partner Organisations

When we work with partner organisations such as schools, care homes, or community groups, we may collect:

- contact details of named individuals within those organisations
- details of the partnership arrangement
- records of joint activities

3.6 Data We Collect Automatically

If you use our website or online share account portal we may collect certain technical data automatically, including your IP address, browser type, and pages visited. This data is used solely for the purpose of maintaining and improving our digital services and is not linked to your personal identity unless you are logged into your account.

4. Why We Collect Your Data and Our Legal Basis

4.1 Members

We process member data to fulfil our obligations under the Co-operative and Community Benefit Societies Act 2014, to manage your membership and shareholding, to communicate with you about Society business, and to enable you to participate in the governance of the Society. Our lawful basis for this processing is that it is necessary for the performance of a contract with you (your membership agreement) and to comply with our legal obligations as a registered society.

4.2 Volunteers

We process volunteer data to manage your volunteering relationship with us, to ensure we deploy volunteers safely and appropriately, to maintain records required by our safeguarding and health and safety obligations, and to communicate with you about volunteering opportunities and training. Our lawful basis is legitimate interests, specifically our interest in running a safe and effective volunteering programme, balanced against your rights and interests as a volunteer. We also rely on legal obligation where processing is required by our safeguarding duties.

4.3 Beneficiaries

We process beneficiary data to provide the services and support you have requested or been referred for, to maintain records of the support we have provided, and to ensure our activities are delivered safely and appropriately. Our lawful basis is legitimate interests in fulfilling our community objects, and in some cases the performance of an informal agreement to provide support.

4.4 Special Category Data

Where we process special category data, we rely on the following additional conditions under UK GDPR Article 9:

- processing is necessary for the purposes of preventive or occupational medicine, the assessment of working capacity, medical diagnosis, or the provision of health or social care, under Article 9(2)(h), where health information is collected to ensure our support is safe and appropriate;
- processing is necessary for reasons of substantial public interest under Article 9(2)(g) and Schedule 1 of the Data Protection Act 2018, specifically in connection with our safeguarding activities;
- processing is carried out by our organisation in the course of legitimate activities as a not-for-profit body, under Article 9(2)(d), where special category data is processed in connection with membership or volunteering.

We will always seek your explicit consent before collecting health or disability information unless there is an overriding safeguarding reason to do so without it. You may withdraw your consent at any time, though this will not affect processing carried out before withdrawal.

4.5 Partner Organisations

We process contact data for individuals within partner organisations on the basis of legitimate interests, specifically our interest in managing our partnerships effectively. Individuals within partner organisations have the same rights over their personal data as any other individual.

5. How We Use Your Data

We use personal data only for the purposes for which it was collected and for purposes that are compatible with those original purposes. Specifically we use personal data to:

- manage memberships, shareholdings, and associated transactions
- recruit, manage, and support volunteers
- deliver growing support and services to beneficiaries
- communicate with members, volunteers, and beneficiaries about our activities
- send notices of meetings and distribute meeting materials
- maintain the registers and records required by law and our rules
- carry out DBS checks and maintain safeguarding records
- apply for grants and report to funders, using anonymised or aggregated data wherever possible
- fulfil our obligations to the FCA, HMRC, and other regulatory bodies
- improve our services and evaluate our impact

6. How Long We Keep Your Data

We retain personal data only for as long as is necessary for the purposes for which it was collected, or as required by law. Our standard retention periods are as follows:

Member data: retained for the duration of membership and for six years following the end of membership, in line with standard legal limitation periods.

Volunteer data: retained for the duration of the volunteering relationship and for six years following its end.

Beneficiary data: retained for six years following the last contact or interaction with the Society.

Safeguarding records: retained for a minimum of seven years, or in the case of records relating to children, until the child reaches the age of 25, whichever is longer, in line with our Safeguarding Policy.

DBS check records: the fact that a check was carried out and its outcome are retained for the duration of the volunteering relationship and for six months thereafter. We do not retain copies of DBS certificates beyond this period.

Financial records: retained for six years following the end of the financial year to which they relate, in line with HMRC requirements.

Meeting minutes and governance records: retained permanently as part of the Society's historical record.

When data is no longer required it will be securely deleted or destroyed in a manner appropriate to its sensitivity.

7. Who We Share Your Data With

We treat your personal data with care and do not share it except in the following circumstances:

Statutory agencies. We may share personal data with Suffolk Children's Services, Suffolk Adult Social Care, the police, or other statutory agencies where we are legally required to do so or where sharing is necessary to protect the safety of a child or vulnerable adult. This may occur without your consent where required by our safeguarding obligations.

The Financial Conduct Authority. We are required to submit an annual return to the FCA which includes certain information about the Society. This does not include individual member personal data beyond what is required by statute.

HMRC. We may share financial information with HMRC in connection with our tax obligations.

The ICO. We may be required to share information with the Information Commissioner's Office in connection with a complaint or investigation.

Service providers. We may share data with third party service providers who assist us in running our activities, such as our online share account platform provider or our email communication system. All such providers are required to process data only on our instructions and in accordance with UK GDPR. We will not engage any provider that does not offer adequate data protection guarantees.

Grant funders. We may share anonymised or aggregated data with grant funders for reporting purposes. We will not share personally identifiable data with funders without your explicit consent.

Other volunteers or directors. We may share limited contact information between volunteers or directors where this is necessary to coordinate activities. We will not share sensitive personal data in this way.

We do not transfer personal data outside the United Kingdom. If this changes we will update this policy and ensure that appropriate safeguards are in place.

8. Your Rights

Under UK GDPR you have the following rights in relation to your personal data. You can exercise any of these rights by contacting us using the details at the top of this policy.

The right to be informed. You have the right to be told how we use your personal data. This policy fulfils that obligation.

The right of access. You have the right to request a copy of the personal data we hold about you. We will respond to subject access requests within one month.

The right to rectification. You have the right to ask us to correct any inaccurate or incomplete personal data we hold about you.

The right to erasure. You have the right to ask us to delete your personal data where we no longer have a lawful basis for holding it. This right is not absolute and may be limited by our legal obligations, for example our obligation to retain safeguarding records.

The right to restrict processing. You have the right to ask us to restrict how we use your data in certain circumstances, for example while we are considering a rectification request.

The right to data portability. Where we process your data on the basis of consent or contract, you have the right to receive your data in a structured, commonly used, machine-readable format.

The right to object. You have the right to object to processing carried out on the basis of legitimate interests. We will cease processing unless we can demonstrate compelling legitimate grounds that override your interests.

Rights in relation to automated decision making. We do not carry out automated decision making or profiling that has a legal or similarly significant effect on individuals.

The right to withdraw consent. Where we process your data on the basis of consent, you may withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

You also have the right to lodge a complaint with the Information Commissioner's Office if you believe we have not handled your personal data lawfully. The ICO can be contacted at www.ico.org.uk or by telephone on 0303 123 1113.

9. How We Keep Your Data Secure

We take the security of your personal data seriously and have put in place appropriate technical and organisational measures to protect it against unauthorised access, loss, destruction, or alteration. These measures include:

- access to personal data is restricted to those who need it to carry out their responsibilities for the Society
- electronic records are stored in password-protected systems with appropriate access controls
- special category data is stored separately from general personal data with additional access restrictions
- safeguarding records are stored securely and accessible only to the Designated Safeguarding Lead, deputy, and Chair
- physical documents containing personal data are stored securely and disposed of by secure shredding when no longer required

- volunteers and directors who handle personal data receive appropriate guidance on data security
- any data breach that is likely to result in a risk to individuals will be reported to the ICO within 72 hours of discovery

We will review our security measures at least annually and following any data breach or significant change in our activities or systems.

10. Data Breaches

A data breach is any incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. If we become aware of a data breach we will:

- assess the risk to individuals affected as quickly as possible
- notify the ICO within 72 hours of becoming aware of the breach, where it is likely to result in a risk to the rights and freedoms of individuals
- notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms
- record all breaches in our data breach log, including those that do not require notification
- take immediate steps to contain the breach and prevent further harm

Any volunteer or director who becomes aware of a potential data breach must report it to the Secretary or Chair immediately.

11. Cookies and the Website

If you visit the Common Ground Suffolk website, we may use cookies to improve your experience. Cookies are small text files stored on your device that help us understand how our website is used. We will only use non-essential cookies with your consent, which we will request when you first visit the site. You can withdraw your consent or manage your cookie preferences at any time through your browser settings or our cookie management tool.

We do not use cookies to track your activity across other websites or to build a profile of your browsing behaviour for advertising purposes.

12. Children's Data

Where we collect personal data about children under the age of 18 in connection with our educational or community activities, we will seek the consent of a parent or guardian before doing so, except where we are required to process data for safeguarding purposes. We process children's personal data with particular care and in accordance with our Safeguarding Policy.

Children aged 13 and over may consent to the processing of their own data in relation to online services under UK GDPR. For all other processing of children's data, parental or guardian consent is required.

13. Changes to This Policy

We may update this policy from time to time to reflect changes in our activities, legal obligations, or data protection best practice. Where we make significant changes we will notify members and volunteers by email or through our online portal. The most recent version of this policy will always be available on our website and on request from the Secretary.

This policy was last reviewed on the date shown at the top of the document. We aim to review it at least annually.

14. Contact Us

If you have any questions about this policy or about how we handle your personal data, or if you wish to exercise any of your rights under UK GDPR, please contact us at:

Email: [Data protection contact email to be inserted]

Post: Common Ground Suffolk, [Registered address to be inserted]

We aim to respond to all data protection enquiries within 14 days and to subject access requests within one month.

15. Related Policies

This policy should be read alongside the following Society documents:

- Safeguarding Policy
- Code of Conduct
- Health and Safety Policy
- Rules of the Society

Policy adopted by the board of Common Ground Suffolk

Date: _____

Signed (Secretary): _____

Signed (Chair): _____