



Data Protection Policy Introduced September 2010

Revised: March 2016

Review date March 2018

Introduction

Members of the Association of London Environmental Health Managers (Alehm) decided that to enable Alehm better achieve its aims and objectives the charitable trading company London Environmental Health Practitioners (LEHP) should be formed to run parallel with Alehm. London Environmental Health Practitioners was established as an incorporated company in 2007 and obtained charitable status in 2008. LEHP is registered at Companies House, company number 6316667, and at the Charities Commission, charity number 1122440. The activities of the Charity are undertaken using the name Alehm.

All public and private organisations including charities are legally obliged to protect any personal information they hold. This document describes the policy Alehm and its specialist topic groups follow for processing personal data in the course of their activities.

The policy is based on the requirements of the Data Protection Act 1998, (updated in 2011), the Privacy and Electronic Communication (EC Directive) Regulations 2003 and guidance issued by the Information Commissioners Office. Further detailed guidance can be obtained from the Information Commissioners website www.ico.gov.uk or from the link provided: <https://ico.org.uk/for-organisations/guide-to-data-protection/>

Formal Notification with the ICO

Alehm is not exempted from formal notification and registered with the ICO in March 2016: -

- All of the data processing that is undertaken is only for the purposes of establishing or maintaining membership or support for a body not established or conducted for profit and;
- data subjects are restricted to the processing of those for whom personal information is necessary for this exempt purpose and
- data classes are restricted to the personal information that is necessary for this exempt purpose and
- data is not kept after the relationship between the data subject and Alehm ends.

The above list would exempt Alehm from registration but Alehm's activities now have extended to include the following activities which are not exempt from registration:

- Collection, storage and sharing of business data, including business names, addresses and contact details, on behalf of local authority members to undertake grant funded enforcement and public awareness activities;
- Collection, storage and sharing of intelligence and evidence as part of the coordination role in partnership investigations on behalf of its local authority members;
- Storage of personal data of contractors, trustees and students undertaking work and training activities on behalf of Alehm.

Further details about data protection can be found at-

For charities and not for profit organisations:

<https://ico.org.uk/for-organisations/charity/>

General guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/>

The 8 key principles of data protection

The Data Protection Act 1998 establishes a framework of rights and duties which are designed to safeguard personal data. The Act is underpinned by a set of eight key principles:

1. Personal data shall be processed fairly and lawfully (sensitive data is subject to conditions)
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be processed in any manner not compatible with that purpose.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and where necessary kept up to date
5. Personal data processed for any purpose shall not be kept longer than is necessary for that purpose.
6. The rights of individuals including access to personal data
7. Information security- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction and damage.
8. Personal data shall not be transferred to a country/territory outside the European Economic Area unless there is assurance of adequate levels of protection of the rights of the individuals whose personal data is being transferred.

How Alehm intends to comply with the key principles of data protection

1. Alehm is committed to ensuring that all personal data received from members is processed fairly and lawfully, as follows-

- Will keep the amount of personal data kept to the minimum necessary to enable the organisation to function effectively;
- Alehm has legitimate reasons for collecting and using the personal data;
- Will handle data reasonably and appropriately;
- Will develop where possible web based arrangements that will reduce the amount of personal data that needs to be kept by Alehm to enable it to function effectively.

2. The personal data that is collected, processed and stored by Alehm includes:

- Details of every member through the membership renewal process,
- Details of applicants and trainees recruited to the sponsored student scheme, to enable Alehm to communicate placement and project opportunities and make bursary payments.
- Details of partner organisations, members and other participants of Alehm and London's Environmental Health related technical groups and any other groups established under the Alehm umbrella, in order to achieve the aims and objectives of the group, which are established and formally agreed by group members.
- Details of businesses which are subject to Alehm operational activity as part of delivery of a regional project or activity.
- Details of intelligence or evidence gathered from partner enforcement organisations as part of an ongoing collaborative enforcement project for the purposes of public protection and prevention of serious criminal activity.
- Details of contractors, trainees and other officers involved in the delivery of Alehm activities.

Generally data held is used to:

- Communicate with members on an individual basis or through the specialist groups on organisational and professional matters and advise them of Alehm events and activities;
- To recover subscriptions;
- To manage the Student Sponsorship scheme.
- To hold data for the duration of projects or investigations and for a period of 6 years after the completion of the project, to enable the effective delivery of the project or investigation and to enable funders to access and audit project records.

3. The data collected is relevant and sufficient to enable Alehm to operate. Only personal data that is sufficient for the purpose of providing effective membership of Alehm and the effective operation of the organisation and specialist topic groups will be obtained and kept. The data collected for each class of membership is provided in the following table

Personal data kept for each class of membership	
Class of membership	Data kept
Alehm member	Name Office email address Office postal address Office telephone number Office Mobile telephone number when provided
Alehm circulation list	Office email address
Alehm Trustees (As required by Companies House and the Charities Commission)	Name Date of birth Nationality Private address Bank details
Students Consortium Scheme. (Sponsored Environmental Health Students who have successfully applied for places on the scheme)	Name email address personal postal address telephone number bank details Application form completed when applying for a place.
Contractors undertaking work on behalf of Alehm	Name email address personal postal address telephone number bank details
Alehm technical groups and partnership organisations	Name Email address Office address Telephone number
Nominals and suspects	Range of intelligence, including Names, Addresses, Company directorships Email address Telephone numbers, Vehicle registration numbers
Business details	Names Addresses Telephone numbers Email addresses

4 . Personal data will be kept accurately and current. Data records will be amended or removed at-

- Any time upon request by a member, Trustee, contractor, student or other person who receives information from Alehm;
- The annual renewal of members subscriptions;

- The appointment of a Trustee;
- The recruitment of students to the Students Consortium Scheme (personal data of unsuccessful applicants is destroyed following the interview process).

5. Alehm understands that The Data Protection Act gives rights to individuals in respect of the personal data that organisations hold about them. All members therefore have a right of access to a copy of their personal data and to have inaccurate information corrected.

6. The Secretary/Coordinator has Norton computer security systems in place to prevent personal data being accidentally or deliberately compromised. Data held by the secretary is stored on Google Drive, is password protected and only the secretary has direct access to this data. Any personal data which is, for sound operational reasons, temporarily stored on a laptop or hard drive, will be password protected.

7. Any other officers, partners or contractors who are required to hold personal data on behalf of Alehm, as part of any ongoing activity or function, will follow the requirements outlined in point 6 above.

Sharing of Data held by Alehm

8. Most data sharing will involve bulk mail sent to interested individuals using pre-agreed contact lists. Emails sent to individuals by use of contact lists will be restricted to members of groups who are part of the Alehm community (local authority officers and government or other partnership bodies and organisations with a legitimate reason for inclusion). Members included on Alehm circulation lists will be deemed to have given permission for internal circulation of the Personal contact details (names, email addresses and telephone numbers) of individuals from outside the Alehm community, may be circulated to members on request of the individual if considered appropriate and beneficial to members. Members' contact details will not be circulated outside the Alehm community, without first requesting approval to do so. Approval will be deemed to be given if a request to individuals to circulate names, email addresses or telephone numbers more widely is not responded to within a specified time. This wider circulation of data will always be for legitimate operational reasons in line with Alehm's overall aims and objectives and for the benefit of local authority members and never for marketing or sales purposes. A list of organisations included within the Alehm community is attached as annexe 1.

Circulation of information to individuals outside the Alehm community will be sent using 'blind copy' function so details of members' contact details are not shared.

9. Alehm may be involved in multi-borough and/or multi-partner operational activities that will require an element of data sharing. This may be to facilitate a cross-boundary, serious criminal investigation or to coordinate a wider project which fulfils Alehm's aims and objectives on behalf of its membership boroughs. Alehm will undertake to comply with any organisation's data sharing protocol, in order to facilitate the agreed activities. A data sharing

agreement will be prepared and agreed by all organisations involved for each project or investigation coordinated by Alehm. A record of the agreement will be recorded in the minutes of the group.

10.. Alehm does not support the use of personal data collected from members for direct marketing by a third party and will not be using data for this purpose.

Policy Review and revision date: March 2018 or sooner if there is a significant change in Alehm's activities or a change to legislation.

Signed by



Alehm Chair

Name Steve Miller

Date: 22nd March 2016

Date of Policy: September 2010

Produced by: Keith Hill

Date policy revised: 2nd March 2016

Reviewed and updated by Janine Avery (Secretary/coordinator)

Annexe 1

List of bodies and organisations included in the Alehm Community

- Food Standards Agency
- Health and Safety Executive
- Public Health England
- Chartered Institute of Environmental Health
- Employees of London local authorities involved in the management or delivery of environmental health related services
- Eurofins
- London Trading Standards
- National Trading Standards
- Government Departments involved in delivery of environmental health services, including Defra, DCLG, Department of Health