



DORSET
Local Enterprise Partnership

**Dorset Local Enterprise
Partnership CIC**

Data Policy

March 2019

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1. Data Protection Policy

- 1.1. Dorset Local Enterprise Partnership (LEP) is a Community Interest Company. Our overarching aim is to create more jobs and drive economic growth in Dorset through public, private and cross sector partnership and investment.
- 1.2. Dorset LEP strives to meet the highest standards when collecting and using personal information and the data relevant to delivery of Dorset LEP's Strategy and funded delivery, in accordance with data protection law.
- 1.3. This policy sets out how Dorset LEP handles data and how we comply with the requirements of the General Data Protection Regulation (GDPR) this includes:
 - Types of data collected, how we collect and store data
 - Handling of confidential and exempt information
 - Publication of papers relating to the Dorset LEP Board and sub-group meetings
 - Freedom of Information requests

2. Glossary of Terms

- 2.1. **Accountable Body:** The Accountable Body is responsible for overseeing the proper administration of financial affairs within each LEP when these affairs relate to public funds. Accountable Bodies have the following functions: financial function, oversight function, support function. Dorset LEP's Accountable Body is Dorset Council.
- 2.2. **Commercially sensitive information:** Commercially sensitive information is information that, if disclosed, could prejudice a supplier's commercial interests. For example, commercial reputation, profit margins, trade secrets, innovation or new ideas.
- 2.3. **Confidential information:** Confidential information refers to information or documentation that a business or individual working with Dorset LEP wishes not to make public. This includes any information acquired in the course of the relationship between parties to deliver Dorset LEP's aims and objectives.
- 2.4. **Personal data:** Personal data is any information that relates to an identifiable individual or different sections of information, which when collected together, can lead to the identification of a particular person.

3. How we collect data

- 3.1. Dorset LEP may collect data from you in the following ways:
 - Through our customer relationship management (CRM) software (used to track engagement for internal reporting purposes and for reporting to government)
 - Via our "Contact us" form (managed through our website)
 - E-newsletter submission form (managed through Mailchimp)
 - Event or workshop form (often managed through Eventbrite)
 - Project request forms
 - Calls for Tenders

- Job applications
- Business survey or market research
- Social media (managed through our social media sites)
- Anonymous cookie information
- All other contact (i.e. through direct contact with team members)

4. Types of data we collect

4.1. The type of information we collect will vary from time to time and will be determined by the purpose the data is being collected for. You will be made aware which information Dorset LEP is collecting at the time. This may include:

- Name
- Job title
- Email address
- Contact telephone number (business, mobile or home)
- Name of Business/ Organisation including parent company or organisation, if applicable
- Nature of Business/ Organisation including type, address, site, website and number of employees
- Firm-level data for a business – typically company registration number, number of employees and annual turnover (collected on behalf of the Government).
- Social media accounts
- Equal opportunities information
- Demographic information such as postcode, preferences and interests
- IP address, location and browser detail
- Conflicts of Interests
- Project information (including commercially sensitive information)
- Finance information
- Other information relevant to business surveys and or/services
- Details of meetings, phone calls, emails, agendas, outcomes, actions, minutes and other documents
- Questions, comments, queries or feedback from engagement activities

5. Where we hold your data

5.1. Dorset LEP has a number of different ways that it holds data depending on the data collection method and the reason for data collection:

5.2. Dorset LEP uses a customer relationship management (CRM) platform for the management of engagement activities with businesses, local authorities, government organisations and private partners. The CRM data is held on secure servers within Europe.

- 5.3. Dorset LEP is hosted by Bournemouth University and stores information on a private drive for Dorset LEP.
- 5.4. Dorset LEP uses MailChimp to send out newsletters to our subscribed stakeholder list.
- 5.5. Dorset LEP uses Survey Monkey to collect information from a number of our stakeholders.
- 5.6. Dorset LEP and the Accountable Body manage the financial transaction information through the Dropbox platform.

6. How we hold your data

- 6.1. Dorset LEP is sensitive to how data is held.

7. Passwords

- 7.1. Where data and information is confidential Dorset LEP will ensure that information is password protected:
- 7.2. Passwords are different for each of the platforms.
- 7.3. Passwords have at least 8 characters and are made up of use at least one number, one uppercase letter, one lowercase letter and one special symbol.
- 7.4. Passwords are changed on a quarterly basis.
- 7.5. Passwords are not emailed
- 7.6. Dorset LEP holds data on different platforms and how this is done differs:

8. CRM

- 8.1. The CRM platform is password protected and accessed by Dorset LEP members of staff with a username. A limited number of externally contracted personnel also have limited access to this data. Data protection principles are written into these signed contracts and activity is monitored regularly by members of the Dorset LEP team to ensure that there are no breaches. We also have a firewall in place around our servers as an additional level of protection against any data breaches.
- 8.2. From time to time, the technical support staff of our CRM platform supplier (Tractivity Ltd) may access your data. We have strict controls over how, why and when they can do this. Any access will only be done on our instruction and under contract.
- 8.3. People have to confirm if they can be contacted with information outside of the standard terms of use (i.e. to be contacted for reasons other than the main purpose of their initial engagement), and the system will not allow them to be contacted if they have not given their express permission to do so.
- 8.4. Anyone registering on the CRM will be asked to confirm that they accept the terms of Dorset LEPs standard privacy notice.

9. Dorset LEP Network Drive (hosted on Bournemouth University's secure servers)

- 9.1. Only Dorset LEP staff and members of Bournemouth University's IT Team have access to this drive.
- 9.2. If information held on the drive is confidential or commercially sensitive, Dorset LEP adopts a best practise approach to have this information password protected.

10. Mailchimp

- 10.1. Only Dorset LEP staff have access to Dorset LEP's MailChimp account which is password protected.
- 10.2. All subscriptions to the Dorset LEP newsletter were reviewed in November 2018 and all stakeholders were asked to confirm that their details could continue to be held.

11. Survey Monkey

- 11.1. Only Dorset LEP staff have access to Dorset LEP's Survey Monkey account which is password protected.
- 11.2. When submitting information individuals are given the option to remain anonymous.
- 11.3. If data is downloaded from the Survey Monkey site it is held securely on the Dorset LEP's private folder on the network drive and password protected.

12. Dropbox

- 12.1. Invoices and signed payment authorisation forms are shared between Dorset LEP and the Accountable Body (Dorset Council) via a password protected Dropbox folder.
- 12.2. The folders used to pay invoices only those who have permission to process financial information are allocated access.
- 12.3. Staff of the Accountable Body also abide by Dorset Council employment policies including data protection.

13. How long we keep your data

- 13.1. We keep your data for as long as we are engaged with you and your organisation, as well as retaining data for audit purposes/
- 13.2. We review the data we hold on an annual basis to ensure that it's accurate and that it complies with principles set out in this policy. We conduct an annual review of our data and the associated processes and procedures relating to it. If an account is dormant for a period of five years then we will deem that account inactive and will remove it from our CRM platform. This is in-line with our Accountable Body's data protection and retention policy.
- 13.3. Backups of our CRM platform data are created once a month, overwriting any previous back-ups that have been made.

13.4. We need to manage its engagement activities properly to provide an effective service. By engaging with us, you agree to let us use your information as set out in this privacy policy.

13.5. The data we collect will not be resold or used for commercial marketing purposes.

14. How we will use your data

14.1. Dorset LEP will use data collected for different outcomes:

14.1.1. As an evidence base for strategy development;

14.1.2. To inform Dorset LEP Board on the delivery of our funded programmes;

14.1.3. For case studies of Dorset LEP delivery. As appropriate, additional permissions will be sought for publication of data and information.

14.2. Where Dorset LEP has collated individual data this will be anonymised when presenting findings from a survey or similar. This ensures that personal data remains confidential.

14.3. The use of the Business's information is collected as part of Dorset LEP's reporting to central government on the Dorset Gateway. This 'firm-level data' – e.g. information relating to the number of employees, date of corporation, turnover - may include matching to other data sources to understand more about organisations that we engage with and support, although the business's data will not be published or referred to in a way which identifies any individual or business. It can also be used to identify general patterns and trends.

14.4. Dorset LEP uses data and information collated on school engagement and enterprise advisers as part of the Enterprise Adviser Network to report to Careers and Enterprise Company. Each School and Enterprise Adviser signed a consent form for this data is shared.

14.5. If the business, school or individual has any questions in relation to how the information provided, will be processed and disclosed please contact Katherine May at kmay@bournemouth.ac.uk.

15. Cookies

15.1. Dorset LEP's website uses cookies. Below explains what cookies are, how we use cookies, how third-parties may use cookies, your choices regarding cookies and further information about cookies.

15.2. Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

16. Analytical/performance cookies

16.1. They allow Dorset LEP to recognise and count the number of visitors and to see how visitors move around our website when they are using it.

16.2. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- 16.3. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites

17. Google Analytics

- 17.1. Dorset LEP uses **Google Analytics** to analyse the usage of our website.
- 17.2. Google Analytics uses cookies to collect information about website use.
- 17.3. You can find more information about Google Analytics in Google's privacy policy here: <https://policies.google.com/privacy>

18. Handling confidential and exempt information

- 18.1. Dorset LEP is committed to being open and transparent about the running of Dorset LEP, the decision making that takes place and strategic direction of the organisation.
- 18.2. Dorset LEP is committed to publishing minutes and papers for full Board Meetings and any sub-groups which involve decisions about public money. Dorset LEP abides by the National LEP Assurance Framework in accordance with the Local Government Act 1972.
- 18.3. Certain information contained with the Dorset LEP Board meetings and sub-groups papers and minutes cannot be placed in the public domain due to its confidential or commercial sensitive nature.
- 18.4. Dorset LEP papers are marked as unclassified, confidential or commercially sensitive. This is to ensure that Board members are aware of the information that they are handling.
- 18.5. Dorset LEP papers are shared with the Dorset LEP Board members ahead of Board meetings and are password protected in compliance with the password section above.
- 18.6. Dorset LEP abides by the information provided by a Government department on terms which forbid the disclosure of the information to the public;
- 18.7. Where disclosure to the public is prohibited by a court or;
- 18.8. Where the Local Enterprise Partnership holds "exempt information" under Schedule 12A of the Local Government Act 1972. This includes information relating to an individual, relating to the financial or business affairs of a particular person, negotiations, labour relations, legal professional privilege and in connection to the investigation or prosecution of a crime.

19. Publication of Board papers

- 19.1. Dorset LEP commits to publishing documents in accordance with above. Where information contained in Board minutes is deemed to be confidential, the relevant section will be clearly marked "Confidential Item". This indicates documents which are not for publication but have been considered at Board Meetings.
- 19.2. To ensure transparency, Dorset LEP Board papers are published with the following timelines agreed with Government:

- 19.3. Meeting agendas and papers to be published 5 clear working days before the meeting takes place;
- 19.4. Minutes of Board Meetings to be published within 10 clear working days of the meeting taking place. This may be in draft if internal Dorset LEP processes require clearance before the minutes are finalised. The final minutes of Board Meetings must be published within 5 clear working days of being approved, normally at the next full Board or sub-group meeting.
- 19.5. Any declaration of interest made at meetings will be included in the minutes of the Board Meeting. A new declaration of interest should be updated on the relevant member's register of interest. Additional information on registers of interest can be found on the Dorset LEP [website](#).

20. Sharing data

- 20.1. Please note that the Accountable Body for Dorset LEP is Dorset Council. In line with this, information may be shared with Dorset Council in order to enable the discharge Dorset LEP's responsibilities. A copy of Dorset Council's [Data Protection](#) is available [here](#).
- 20.2. All Dorset LEP staff are employed by Bournemouth University. Employment and recruitment information will be collected and stored by Bournemouth University. A copy of Bournemouth University's [Data Protection and Privacy Policy](#) is available [here](#).
- 20.3. Dorset LEP does not share your information with anyone outside of these organisations, however,
- 20.4. Dorset LEP Staff Code of Conduct outlines that staff employed by Dorset LEP will have regard to the Nolan principles of public life relating to selflessness, integrity, objectivity, accountability, openness, honesty and leadership in their conduct at all times. A copy of Dorset LEP's Code of Conduct can be available [here](#).
- 20.5. To ensure that data is managed in line with the Code of Conduct and the principles set out in this policy, Dorset LEP staff must act solely in the public interest. They should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for themselves, their family, a friend or close associate.
- 20.6. Dorset LEP has a disciplinary process in place if data and information is shared by Dorset LEP staff or Board members by accident or on purpose.

21. What are your rights?

- 21.1. We would like to send you e-updates on Dorset LEP activities which may be of interest to you. If you have consented to receive marketing, you will be given the option to opt out at any time.
- 21.2. You have a right at any time to stop us from contacting you. If you no longer wish to be contacted, please email cknight@bournemouth.ac.uk and we will remove you from any mailing lists.

21.3. You can request your information from us at any time by emailing cknight@bournemouth.ac.uk. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

22. Freedom of information

22.1. The Freedom of Information Act 2000 gives the public the right to request information held by public authorities. The Act aims to ensure that public sector bodies are open and accountable and encompasses any recorded information.

22.2. LEPs are not formally subject to the Freedom of Information Act.

22.3. Dorset LEP is open and transparent in its working and will adhere to the principles of the Freedom of Information Act.

22.4. If you have any questions please contact us through the Dorset LEP website and you will receive a response (or request for clarification) within 20 working days.