



THE NORFOLK  
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## PRIVACY POLICY

### Policy summary

The Trust's Privacy Policy explains how we collect, store and use the personal information given to us.

The Trust is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation May 2018.

We will:

- process personal data lawfully, fairly and in a transparent manner
- be clear about why we need to collect personal information and what we are going to use it for
- make it easy for people to tell us how they would like to keep in touch
- only collect and retain the information we need to deliver our objectives
- never sell or share personal information, or let other organisations use it for marketing
- take good care of personal information, and make sure it is up to date, safe and secure at all times
- make sure that any suppliers or partners who carry out work on our behalf meet the same standards that we adhere to when handling personal information

If you have any questions concerning your personal data and how we look after it then please contact us at [info@norfarchtrust.org.uk](mailto:info@norfarchtrust.org.uk) or Tel: 01603 462987

Full copies of the Trust's Privacy Policy can be downloaded from the Trust's website or hard copies can be supplied on request.

Adopted by Trust Council 10.10.2017 Updated 24.03.2018

The Norfolk Archaeological Trust is registered as a charity (number 274604) and as a company limited by guarantee, registered in England (number 191668). Registered office: Castle Chambers, Opie Street, Norwich, NR1 3DP 1



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### Norfolk Archaeological Trust Privacy Policy

<b>Aims of this Policy</b>	<p>Norfolk Archaeological Trust needs to keep information on its members, Council members, staff, contractors, volunteers, and service users in order to carry out its day to day operations, meet its objectives and comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with the 2018 General Data Protection Regulation (GDPR). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>The aim of this policy is to ensure that everyone handling personal data within the Trust is fully aware of the requirements and acts in accordance with data protection procedures; and to provide public information on how we will process personal data</p> <p>This policy covers members, Council members, staff, contractors, volunteers, and service users.</p>
<b>Definitions</b>	<p>In line with the 2018 General Data Protection Regulation (GDPR), Norfolk Archaeological Trust will ensure that personal data will be:</p> <ul style="list-style-type: none"><li>● processed lawfully, fairly and in a transparent manner</li><li>● collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes</li><li>● adequate, relevant and limited to what is necessary</li><li>● accurate and kept up to date</li><li>● kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed</li><li>● processed in a manner that ensures appropriate security of the personal data.</li></ul> <p>The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.</p>



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	<p><b>Principles of operation:</b></p> <ul style="list-style-type: none"> <li>● <b>Accountability:</b> those handling personal data will follow publicised data principles to help gain public trust and safeguard personal data.</li> <li>● <b>Visibility:</b> Data subjects must have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.</li> <li>● <b>Legitimate Interest:</b> the Trust will only use data in ways people would reasonably expect as part of Trust activities and which have a minimal privacy impact.</li> <li>● <b>Consent:</b> The collection and use of personal data must be fair and lawful and transparent in accordance with 2018 GDPR . Personal data will only be used for the purposes agreed by the data subject. If it is proposed to share personal data with a third party or used for another purpose, the data subject’s consent will be explicitly obtained beforehand, and consent recorded.</li> <li>● <b>Access:</b> Everyone has the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.</li> <li>● <b>Stewardship:</b> Those collecting personal data have a duty of care to protect this data throughout the data life span.</li> </ul>
<p><b>Type of information processed</b></p>	<p>Norfolk Archaeological Trust processes the following personal information:</p> <ul style="list-style-type: none"> <li>● Information on applicants for posts, including references</li> <li>● Employee and contractor information including contact details, bank account numbers, payroll information</li> <li>● Members – contact details</li> <li>● Volunteers – contact details, personal information regarding relevant health issues</li> <li>● Service users – contact details</li> <li>● Council members – personal information including information on business and other interests</li> </ul> <p>This information is documented on the Trust’s Information Asset Record, and includes information on who is responsible for the</p>



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	<p>information, who has access to the information, and retention periods for the information</p> <p>Personal information is kept in the following forms:</p> <ul style="list-style-type: none"> <li>● Electronic spreadsheets and word documents</li> <li>● Paper files</li> </ul> <p>Groups of people within the organisation who will process personal information are:</p> <ul style="list-style-type: none"> <li>● Employed staff</li> </ul>
<b>Notification</b>	<p>The Trust is exempt from the legal requirement to register with the Information Commissioner’s Office (ICO). However, the Trust is committed to the principles of the 2018 General Data Protection Regulation (GDPR) and aims to follow best practice for managing information</p>
<b>Responsibilities</b>	<p>Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of Norfolk Archaeological Trust this is the Trust Council. The organisation must ensure that it has sufficient staff and skills to discharge its obligations under the GDPR.</p> <p>All employed staff who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles. Serious breach of this policy may result in disciplinary proceedings.</p>
<b>Policy Implementation</b>	<p>To meet our responsibilities staff will:</p> <ul style="list-style-type: none"> <li>● Ensure any personal data is collected in a fair, lawful and transparent way;</li> <li>● Explain why it is needed at the start (e.g. through a ‘privacy notice’ to be included on a mailing list for a specific project)</li> <li>● Ensure that only the minimum amount of information needed is collected and used;</li> <li>● Ensure the information used is up to date and accurate;</li> </ul>



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<b>Training</b>	<p>Training and awareness raising about the 2018 General Data Protection Regulations and how they are followed in this organisation will take the following forms:</p> <p>On induction: Staff will be provided with a copy of the Trust’s Privacy Policy and receive specific training on how to implement it.</p> <p>General training/ awareness raising: The Trust will review the policy on a regular basis, and when legislation requires.</p>
<b>Gathering and checking information</b>	<p>Before personal information is collected, we will consider:</p> <ul style="list-style-type: none"> <li>● What details are necessary for our purposes</li> <li>● How long we are likely to need this information</li> </ul> <p>We will inform people whose information is gathered through a ‘privacy notice which will include:</p> <ul style="list-style-type: none"> <li>● who is collecting the information</li> <li>● why the information is being gathered</li> <li>● what the information will be used for</li> <li>● who will have access to their information.</li> </ul>



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	<ul style="list-style-type: none"><li>● How long the information will be kept</li><li>● How to complain if there is a problem in the way the data is being handled</li></ul> <p>This information will be included on any form or other format used to collect data.</p> <p>The Trust will not release personal data to any third party unless prior consent has been obtained from the owner of the data.</p> <p>We will take the following measures to ensure that personal information kept is accurate:</p> <ul style="list-style-type: none"><li>● We will update our records immediately when informed of new details; and delete out of date information</li><li>● We will review our records of personal information regularly (at least annually) to ensure that we are not holding data that is no longer required.</li></ul> <p>Personal sensitive information will not be used apart from the exact purpose for which permission was given.</p>
<b>Data Security</b>	<p>The Trust will comply with the GDPR's requirement to adopt a 'Privacy by design' approach that promotes privacy and data protection compliance from the start of any new project. A 'Privacy Impact Assessment' will be undertaken following current best practice.</p> <p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:</p> <ul style="list-style-type: none"><li>● All information is held on private computers which are password protected and hold up-to-date security software; or cloud servers that comply with The EU Data Protection Directive</li><li>● All group mailing is done via BCC ('blind carbon copy') or by using other anonymous mailing list software.</li><li>● If groups of volunteers or other service users wish to share contact information as part of their activities, prior consent of all parties is obtained and recorded before contact details are shared.</li><li>● Sensitive personal information sent via email (such as personal references) will not use Auto-Complete address lists -</li></ul>



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	<p>addresses must be typed in, and checked prior to sending. Addresses for data sent through the post must be checked with the addressee prior to sending, under recorded delivery where appropriate.</p> <ul style="list-style-type: none"> <li>● Where data breaches are identified, action will be taken immediately to rectify the issue.</li> <li>● All breaches will be recorded in order to assess whether new practices or training need to be implemented.</li> <li>● Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings.</li> </ul> <p>The Trust Council is accountable for compliance of this policy.</p>
<p><b>Subject Access Requests</b></p>	<p>Anyone whose personal information we process has the right to know:</p> <ul style="list-style-type: none"> <li>● What information we hold and process on them</li> <li>● How to gain access to this information</li> <li>● How to keep it up to date</li> <li>● What we are doing to comply with the GDPR.</li> <li>● They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</li> </ul> <p>Individuals have a right to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should contact <a href="mailto:info@norfarchtrust.org.uk">info@norfarchtrust.org.uk</a></p> <p>The following information will be required before access is granted:</p> <ul style="list-style-type: none"> <li>● Full name and contact details of the person making the request</li> <li>● their relationship with the organisation (former/ current member of staff, trustee or other volunteer, service user</li> <li>● If the information request is for personal information over and above contact details a form of identification will be required before information is released</li> </ul>



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	<p>In this case the following forms of ID will be required:</p> <ul style="list-style-type: none"><li>• Copy of passport or driving licence</li><li>• Copy of utility bill showing name and address</li></ul> <p>Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within a month from receiving the written request</p> <p>Under the 2018 GDPR, the Trust can refuse or charge for requests that are manifestly unfounded or excessive. If the Trust refuses a request, we will tell the applicant why and that they have the right to complain to the supervisory authority and to a judicial remedy. We will do this without undue delay and at the latest, within one month.</p>
<b>Review</b>	<p>This policy will be reviewed at intervals of 3 years or when legislation changes to ensure it remains up to date and compliant with the law.</p> <p>Last reviewed: 24.03.18</p>
<b>Declaration</b>	<p>I confirm I have read and understood Norfolk Archaeological Trust's Data Protection Policy and will act in accordance with it.</p> <p>I am connected with this organisation in my capacity as a:</p> <ul style="list-style-type: none"><li>• Member of staff</li><li>• Volunteer</li><li>• Council member</li></ul> <p>Signature:</p> <p>Print name:</p> <p>Date:</p> <p>Please return this form to Caroline Davison, Director, at <a href="mailto:info@norfarchtrust.org.uk">info@norfarchtrust.org.uk</a></p>