

WITHAM AND HUMBER DRAINAGE BOARDS

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.



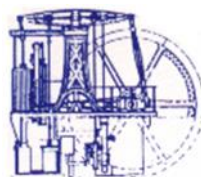
Witham First District IDB

www.witham-1st-idb.gov.uk



Upper Witham IDB

www.upperwitham-idb.gov.uk



Witham Third District

www.witham3idb.gov.uk



North East Lindsey

www.northeastlindsey-idb.org.uk

DATA PROTECTION POLICY – INFORMATION ASSURANCE

Background	<p>The 4 Boards are required to meet its legal obligations and requirements concerning confidentiality and information security standards.</p> <p>The requirements within the Policy are primarily based upon the Data Protection incorporating the Data Protection Regulation 2016 and the General Data Protection Act 2018 which is the key piece of legislation covering security and confidentiality of Personal Confidential Information (PCI).</p> <p>The policy is split into sections and details specific procedures for achievement of the policy standards.</p>
Statement	<p>This policy covers records held and processed by the Witham and Humber Drainage Boards, responsible for its own records under the terms of the Act and it has submitted a notification as a Controller to the Information Commissioner.</p>
Responsibilities	<p>This Policy will apply to:</p> <ul style="list-style-type: none"> • All staff including any temporary staff • All information or systems used and managed by the Witham and Humber Drainage Boards • Any individual using or requires access to information 'owned' by Witham and Humber Drainage Boards
Training	<p>Facilitated via Induction and Training updates</p>
Dissemination	<p>Team meeting, website and policy training</p>
Resource Implication	<p>Requirements of updates</p>
	<p>Version 5 17.07.20</p>
Approval Date	<p>July 2020</p>
Review Date	<p>3-year review or as required</p>

1. Introduction

- 1.1 The 4 Boards (the Boards') have a statutory duty to meets obligations as set out within data protection legislation as it processes personal data when conducting business.

2. Aim

- 2.1 The aim of the policy is to outline the commitment and approach to achieving obligations as required by data protection legislation.

3. Scope

3.1. This policy applies to:

3.1.1. All personal data processed by the Boards' regardless of its format.

3.1.2. Any individual processing personal data held by the Boards'.

4. Definitions

4.1. The following definitions shall apply:

4.2. **Data Protection Legislation** means:

4.2.1. The General Data Protection Regulation ("GDPR")

4.2.2. The Data Protection Act 2018

4.2.3. The Privacy and Electronic Communications Regulations 2003 (as amended)

4.2.4. Any other applicable law concerning the processing of personal data and privacy.

4.3. **Data** means information which:

4.3.1. Is being processed wholly or partly by automated means.

4.3.2. Is processed other than by automated means and forms part of a filing system i.e. structured set of data which are accessible by specific criteria.

4.3.3. Is processed other than by automated means and is intended to form part of a filing system.

4.4. **Personal data** means any information, which either directly or indirectly, relates to an identified or identifiable living individual. Identifiers include name, address, and date of birth, postcodes, unique identification numbers, location data, online identifiers (such as an IP address), pseudonymised data and information relating to a person's social or economic status.

4.5. **Special Category Data** means personal data consisting of information as to:

4.5.1. The racial or ethnic origin of the data subject.

4.5.2. Political opinions.

4.5.3. Religious beliefs or other beliefs of a similar nature.

4.5.4. Whether he/she is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992).

4.5.5. Physical or mental health or condition.

4.5.6. Biometric and/or genetic data.

4.5.7. Sex life or sexual orientation.

4.6. **Criminal Convictions Data** means personal data consisting of information as to:

4.6.1. The commission or alleged commission by him/her of any offence, or

4.6.2. Any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

4.7. **Processing** in relation to information or data, means any operation(s) performed on personal data or sets or personal data (whether automated or not) such as collection, use, storage, disclosure, dissemination and destruction.

4.8. **Data subject** means an individual who is the subject of personal data.

4.9. **Controller** means a person or organisation who (either alone or jointly or in common with other persons) determines the purposes for which, and the manner in which, any personal data is, or is to be, processed. A controller may also act jointly with another organisation to process personal data.

4.10 **Processor**, in relation to personal data, means any person or organisation (other than an employee of the controller) that processes data on behalf of the controller.

5. The Six Data Protection Principles

5.1. The Boards' shall adhere to the six principles of data protection, which are:

5.1.1. Principle 1: Personal data shall be processed fairly and lawfully and in a transparent manner.

5.1.2. Principle 2: Personal data shall be collected for specified, explicit and legitimate purposes shall not be processed in a manner incompatible with that purpose.

5.1.3. Principle 3: Personal data shall be adequate, relevant and limited to what is necessary for the purpose.

5.1.4. Principle 4: Personal data shall be accurate and, where necessary kept up to date.

5.1.5. Principle 5: Personal data shall be kept in a form that permits identification for no longer than necessary.

5.1.6. Principle 6: Personal data shall be processed in a manner that ensures appropriate security.

5.2. In addition, the 4 Boards' shall ensure that they comply with the 'accountability principle' which requires that the Boards' has appropriate processes and records in place to demonstrate its compliance with the principles listed above.

6. The Boards' Responsibilities

6.1 The Boards' shall ensure that:

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- 6.1.1. It pays the annual statutory data protection fee to the Information Commissioner's Office. The Boards' data protection registration number is (insert the requirement for each Board)
- 6.1.2. It has in place appropriate policies and processes which aim to support the Boards' in meeting its obligations under data protection legislation.
- 6.1.3. It has access to specialist staff with specific responsibility for providing support and guidance to the Boards'.
- 6.1.4. Staff processing personal data understand that they are responsible for complying with the data protection principles and are appropriately trained.

7. Data Protection Officer (DPO)

- 7.1 The organisation will have in place a DPO responsible for supporting the Chief Executive in meeting the obligations under data protection legislation.
- 7.2 The role, which is a statutory requirement, will:
 - 7.2.1. Monitor ongoing compliance.
 - 7.2.2. Provide advice and guidance on all data protection matters.
 - 7.2.3. Act as a point of contact for all data subjects.
 - 7.2.4. Act as the single point of contact for the Information Commissioner's Office and any other bodies engaged in the application of data protection legislation.

8. Data Protection Roles and Responsibilities

- 8.1 In addition to the DPO the following roles are established:
- 8.2. the owner of information risk management at director level and is responsible for leading and fostering a culture that values, protects and uses information in a manner which benefits the boards', employees and the individuals and community who use the Boards' services.
- 8.3. responsible for the assurance of information, identification, management and implementation of information risk.
- 8.4. responsible for providing governance support, guidance, and training to the Boards' ensuring that staff are aware of their data protection responsibilities and obligations.
- 8.5. ensure that specific information assets are handled and managed appropriately, key decision makers across information they own.
- 8.6 All line managers are responsible for ensuring that the requirements of this policy are integrated into service procedures and that staff comply with all relevant policies in their area of responsibility.

8.7 All Staff are responsible for ensuring they process information in line with this policy. This includes complying with related policy requirements and undertaking training.

9. Record of Processing Activity

9.1 The Boards' shall maintain a written record of its data processing activities.

10. Privacy Notices

10.1 To support open and transparent data processing the Boards' shall ensure that privacy notices are made available to data subjects.

10.2 The Boards' will adopt a layered approach to privacy notices i.e. Corporate / Directorate / Function (where necessary).

10.3 Privacy notices will be clear, concise, and in plain English.

10.4 A copy of any privacy notice shall be provided on request and free of charge.

11. Data Protection Impact Assessment (DPIA)

11.1. The Boards' shall aim to complete a DPIA at the early stages of any processing activity that involves high risk processing. Such activities include processing on a large scale; systematic monitoring; or processing special category data.

11.2. The DPIA shall be used to identify and remediate privacy risks.

11.3. Staff shall consult at an early stage to identify DPIA requirements.

11.4 The Chief Executive shall be consulted on all DPIAs.

12. Data Security

12.1 The Boards' shall ensure it has an information security management system in place that aims to reduce the risk of personal data breaches.

12.2 Security policies and procedures shall be made available to all staff.

12.3 The Boards' shall record and investigate all personal data breaches.

12.4 Where it is determined that a breach results in a risk to the rights and freedoms of an individual(s) will aim to report the breach to the Information Commissioner's Office within 72 hours of becoming aware.

12.5 Where it is determined that a breach results in a high risk to the rights and freedoms of an individual(s) the DPO shall inform the individual(s) without undue delay.

13. Contracts

13.1. Contracts shall include measures to ensure personal data is handled in accordance with data protection legislation.

- 13.2 Personal data shall only be supplied for the agreed purposes as set out in the contract and shall not be used or disclosed for any other reason.
- 13.3 The boards' shall ensure that before personal data is shared with a third party as part of a contract, appropriate security controls are in place.

14. Information Sharing

- 14.1. The Boards' shall ensure that information is shared only when it is within the provisions of data protection legislation.
- 14.2. The Boards' shall ensure that when information is shared it is justified and necessary to meet a lawful basis for processing as set out at Appendix A to this policy.
- 14.3. The Boards' shall ensure that adequate security is in place to protect the data when it is shared with another organisation and that information sharing arrangements are documented.
- 14.4. The Boards' shall ensure that information sharing agreements exist between the Boards' and partnership agencies where required.
- 14.5. Guidance on information sharing in the context of systematic sharing and sharing in ad-hoc, one off circumstances.

15. Individual Rights

- 15.1 The DPO shall ensure that adequate processes are in place to support individuals who wish to exercise their rights in respect of their personal data.
- 15.2. The DPO shall respond to any request to exercise individual rights within one calendar month.
- 15.3. Complaints regarding how the DPO processes personal data shall be referred to the relevant service area in the first instance and then to the Chief Executive if the matter cannot be resolved.

16. Training & Awareness

- 16.1. mandatory annual data protection training to all staff handling personal data.
- 16.2. Individuals shall maintain a good awareness of data protection.
- 16.3. Additional training shall be provided where appropriate.

17. Close Circuit Television (CCTV)

- 17.1 Images and audio recordings of identifiable individuals captured by CCTV amount to personal data relating to that individual and will be subject to the same provisions and safeguards afforded by data protection legislation as other types of recorded information.
- 17.2. A CCTV Policy and supporting guidance shall be made available to all staff setting out the Boards' commitment to meet its data protection and wider legal obligations when using such a system.

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17.3. The DPO will ensure that any use of CCTV is necessary and proportionate to achieve its objective and any introduction of surveillance camera system for a new purpose will be subject to a Data Protection Impact Assessment prior to being used.

18. International Transfers

18.1 Any systematic sharing of personal data outside of the UK shall be subject to a DPIA.

19. Information Commissioner's Office

19.1. Witham and Humber Drainage Boards shall comply fully with all requests from the Information Commissioner's Office to investigate and/or review their data processing activities.

19.2. The Boards' shall have regard to advice and guidance produced by the Information Commissioner's Office as far as it relates to their data processing activities.

19.3. The Boards' shall consider any code of practice published by the Information Commissioner's office and shall endeavour to align its own practices accordingly.

20. Policy Review

20.1 This policy shall be reviewed 3 yearly or as required.

Appendix A – Lawful Bases for Processing

You must have a valid lawful basis in order to process personal data.

You must determine the lawful basis before you begin processing and this must be appropriately documented.

No single basis is 'better' or more important than the others – which basis is most appropriate will depend on the purpose for processing and the employer relationship with the individual(s) concerned.

There are six available lawful bases for processing Personal Data:

Consent – freely given, informed and evidenced by a clear affirmative action
Contract – necessary for the performance of a contract with the Data Subject (Inc. specific steps before entering into a contract)

Legal Obligation – necessary to comply with the law

Vital Interests – necessary to protect the life of the data subject

Public Task – necessary to perform a task in the public interest or for the employer official functions, and the task or function has a clear basis in law.

Legitimate Interests – necessary for the employer, or a third parties, legitimate interests in circumstances where the Data Subject's right to privacy does not override those legitimate interests (NB. This legal basis is unavailable for public authorities when the processing is in connection with an official task)

If you are processing Special Category Personal Data, you must also identify a further lawful basis. There are ten available lawful bases for processing Special Category Data:

1. Explicit Consent – freely given, informed and evidenced by a clear affirmative action
2. Employment, social security or social protection law – necessary to meet legal obligations in these specific areas
3. Vital Interests – necessary to protect the life of the data subject or another individual where they are physically or legally incapable of giving consent
4. Not-for-profit Bodies – processing carried out by a political, philosophical, religious or trade union
5. Deliberately made public by the Data Subject – data that has manifestly been placed in the public domain by the Data Subject
6. Legal Claims – necessary for establishing, exercising or defending legal rights.
7. Substantial Public Interest – necessary for reasons of substantial public interest e.g. official functions, statutory purposes, equal opportunities or preventing or detecting unlawful acts.
8. Health and Social Care – necessary to preventative or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, provision of health or social care or treatment or management of health and social care systems
9. Public interest in the area of Public Health – such as threats to health or ensuring high standards of healthcare
10. Archiving Purposes – public interest, scientific and historical research purposes or statistical purposes.

Further lawful bases are available for processing Criminal Convictions Data and advice must be sought prior to processing to determine what the appropriate lawful basis is.

Appendix A - Confidentiality agreement

This agreement is made between *EMPLOYING BOARD* and *EMPLOYEE NAME*

During your employment, you may have access to and knowledge of confidential information.

Disclosure of any of this confidential information could have serious reputational or financial consequences and/or create serious competitive disadvantages for Witham and Humber Drainage Boards. There may be material damage, financial or otherwise, deliberate or otherwise, to legitimate business interests.

Under the terms of this confidentiality agreement, you agree not to disclose and shall not at any time, either during employment or post-employment, use, communicate or reveal to any person any confidential information relating to the Boards.

This includes:

- the systems, techniques or know how of the Witham and Humber Drainage Boards suppliers or customers as they exist from time to time.
- systems, designs and other computer technology, software specifications, documentation, product lists, customer lists, research and development, formulae or formulations, costings, profit margins, discounts, rebates and other financial information.
- current Witham and Humber Drainage Boards' business activities, including past, present and future plans relating to all or any development, production or sales including the timing or all or any such matters.
- pricing, credit policies, credit procedures, payment policies, payment procedures and systems for the same, details of suppliers, customers or prospective suppliers and customers.
- any other information which is notified to you during your employment as being confidential or is received or obtained by you in confidential circumstances.

The restrictions under the terms of this confidentiality agreement shall not apply to:

- any disclosure or use of information the employer has expressly authorised or as required in the ordinary and proper course of your employment or as required by a court or tribunal of competent jurisdiction or as required by a relevant regulatory authority; or
- information already in the public domain not as a result of a breach of this clause or breach of an equivalent provision or other unlawful act (whether done by you personally or by an agent, whether on your own account or for or in association with any other person or by any other employee).

Documentation generated during your employment

All documentation generated during your employment including notes, memoranda, records and writings that relate to the business shall remain the property of Witham and Humber Drainage Boards.

On termination of your employment for any reason you shall immediately return all books, documents, original papers, copy papers, materials and other property of or relating to the business currently in your possession or which are or were last under your possession, custody, power or control.

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Signed by Employee:

Print Name:

Position:

Print Name:

Position:

Signed by Employer:

Date:

Appendix B - Privacy notice

The 4 Boards are aware of their obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation and are committed to processing your data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that we hold on you as an employee of a Board within the Group. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former employees and workers.

Data controller details:

The Board is a data controller, meaning that it determines the processes to be used when using your personal data. Our 4 independent Boards' contact details are as follows:

Witham and Humber Drainage Boards

North East Lindsey, Upper Witham, Witham First District and Witham Third District Internal Drainage Boards

Meadow Lane

Lincoln

LN6 9TP

www.witham3idb.gov.uk

+44 (0) 1522 697123

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have not consented to (as appropriate), lost or destroyed.

Types of data we process

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- marital status
- dependants, next of kin and their contact numbers
- medical or health information including whether you have a disability

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- information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin
- information included on your CV including references, education history and employment history
- documentation relating to your right to work in the UK
- driving licence
- bank details
- tax codes
- National Insurance number
- current and previous job titles, job descriptions, pay grades, pension entitlement, hours of work and other terms and conditions relating to your employment/engagement with us
- letters of concern, formal warnings and other documentation regarding any disciplinary proceedings or, in the case of workers, confirmation of other discussions about your conduct
- internal performance information including measurements against targets, formal warnings and related documentation about capability procedures, appraisal forms or, in the case of workers, confirmation of other discussions about your performance
- leave records including annual leave, family leave, sickness absence etc
- details of your criminal record
- training details
- CCTV footage
- building entry card records.

How we collect your data

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in a CV or a recruitment cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment/engagement, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references.

Personal data is kept in personnel files and/or within the 4 Boards' HR and ICT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to
- in order to carry out legally required duties
- for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest
- where we have obtained your consent.

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All the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data in order to:

- carry out the contract that we have entered with you and
- ensure you are paid.

We also need to collect your data to ensure we are complying with legal requirements such as:

- ensuring tax and National Insurance is paid
- carrying out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled individuals.

We also collect data so that we can carry out activities which are in the legitimate interests of the Board. We have set these out below:

- making decisions about who to offer initial employment/engagement to, and subsequent internal appointments, promotions etc
- making decisions about salary and other benefits
- providing contractual benefits to you
- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- if you are an employee, effectively monitoring both your conduct and your performance and to undertake procedures regarding both of these if the need arises
- if you are an employee, offering a method of recourse for you against decisions made about you via a grievance procedure
- assessing training needs
- implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments
- gaining expert medical opinion when making decisions about your fitness for work
- managing statutory leave and pay systems such as maternity leave and pay etc
- business planning and restructuring exercises
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and ICT systems are secure and robust against unauthorised access

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race

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- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- in our sickness absence management procedures
- to determine reasonable adjustments

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us to do so. This data will usually be collected at the recruitment stage, however, may also be collected during your employment.

We only process criminal conviction data in the following ways because of our legal obligation.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your employment contract with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties e.g. ensuring you are paid correctly. We may also be prevented from confirming, or continuing with, your employment/engagement with us in relation to our legal obligations if you do not provide us with this information e.g. confirming your right to work in the UK or, where appropriate, confirming your legal status for carrying out your work via a criminal records check.

Sharing your data

Your data will be shared with colleagues within the Boards where it is necessary for them to undertake their duties. This includes, for example, your line manager for their management of you, administration department for administering payment and maintaining personnel records under your contract.

We share your data with third parties in order to obtain references as part of the recruitment process.

We may also share your data with third parties as part of a Board sale or restructure, or for other reasons to comply with a legal obligation upon us.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Retention periods can vary depending on why we need your data, as set out below:

Automated decision making

No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our subject access request policy which is available on the 4 Boards' website[s] as part of the GDPR policy.
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you can require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct

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- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Witham House on 01522 697123.

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.