

Dorset Local Enterprise Partnership

Data & Privacy Policy

November 2024

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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's contact details are:
 - 1.2.1. Poole House, Bournemouth University, Fern Barrow, Bournemouth, Dorset, BH12 5BB
 - 1.2.2. Contact Email: dorsetlep@bournemouth.ac.uk
 - 1.2.3. Contact Phone Number: 01202 965868
- 1.3. 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.
- 1.4. 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 section 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 business and reporting purposes and for reporting to government)
- Via our "Contact us" forms (managed through our website)
- E-newsletter sign up forms (managed through our websites)
- Event or workshop forms (often managed through Eventbrite)
- Project request forms and project management
- Calls for Tenders, quotations and contract management
- Job applications
- Business surveys or market research
- Social media (managed through our social media sites)
- Website activity
- Images taken at events put on and attended by Dorset LEP
- Images and biographies of board, committee and network members collected
- Financial records
- From suppliers and providers
- Publicly available sources
- From third parties such as education institutions, partners and councils.
- All other contact and general records (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 (age, gender, ethnic group, neuro or physical condition)
- 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
- Still and moving photographic images
- Records of consent
- Data submitted as part of Disclosure and Barring Service process
- Anonymous website cookie data

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, private personal drives for team members, shared sites (e.g. Teams).
- 5.4. Dorset LEP uses Microsoft FORMS to collect information from a number of our stakeholders.
- 5.5. Dorset LEP and the Accountable Body manage the financial transaction information through the Teams platform.
- 5.6. Dorset LEP has websites which include Team, Board, Committee and network member information.
- 5.7. Dorset LEP has minimal paper legal, financial and project management documentation.

6. How we hold your data

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

7. Passwords

- 7.1. Access to laptops, shared and individual storage drives is access controlled and restricted to authorised users.

Passwords for access to BU devices and servers 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 and are changed on a quarterly basis.

- 7.2. Passwords are not emailed.
- 7.3. Dorset LEP holds data on different platforms which have different requirements for password security.
- 7.4. Where data and information is confidential Dorset LEP will ensure that information is password protected if it is shared.

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 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 external 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. Microsoft FORMS

- 10.1. Dorset LEP staff have access to Microsoft FORMS through their BU access to Microsoft Office which is password protected.
- 10.2. When submitting information individuals are given the option to remain anonymous.
- 10.3. If data is downloaded from the FORMS, it is held securely on the Dorset LEP's private folder on the network drive and password protected.

11. How long we keep your data

- 11.1. We keep your data for as long as we are engaged with you and your organisation, as well as retaining data for audit purposes, and in line with

regulatory requirements and in line with our Accountable Body's data retention schedule.

- 11.2. 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.
- 11.3. If an account on our CRM is dormant for a period of five years, then we will deem that account inactive and will remove it from our CRM platform. Backups of our CRM platform data are created both daily and retained for 14 days and monthly and retained for 30.
- 11.4. We need to manage our 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.
- 11.5. The data we collect will not be resold or used for commercial marketing purposes.

12. How we will use your data

- 12.1. Dorset LEP will use data collected for different reasons:
 - 12.1.1. As an evidence base for strategy development;
 - 12.1.2. To inform Dorset LEP Board and management on the delivery of our funded programmes;
 - 12.1.3. For case studies and publicity of Dorset LEP delivery. As appropriate, additional permissions will be sought for publication of data and information;
 - 12.1.4. For financial and contract management;
 - 12.1.5. For business activity, monitoring and evaluation related to the delivery of our funded programmes;
 - 12.1.6. For marketing communications
 - 12.1.7. To coordinate and manage events
- 12.2. Where Dorset LEP has collated individual data for reporting purposes, this will be anonymised when presenting findings from a survey or similar. This ensures that personal data remains confidential.
- 12.3. The use of the Business's information is collected as part of Dorset LEP's reporting to central government on the Dorset LEP Business. 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.
- 12.4. 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 to be shared.

12.5. If the business, school or individual has any questions in relation to how the information provided, will be processed and disclosed please contact Rebecca Davies at rdavies@bournemouth.ac.uk.

13. Lawful Bases

13.1. Our lawful bases for collecting or using personal information to provide services and goods are:

13.1.1. Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

13.1.2. Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

13.1.3. Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

13.1.4. Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

13.1.4.1. We collect personal information in order to conduct our business effectively and efficiently.

13.1.4.2. We collect information in order to run events and programmes and publicise our work.

13.1.4.3. We collect data proportionate to a complaint or query.

14. Cookies

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

14.2. 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.

Types of Cookies

14.2.1. Necessary Cookies: Necessary cookies are required to enable the basic features of this site, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

14.2.2. Functional Cookies: Functional cookies help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other third-party features.

14.2.3. Analytical Cookies: Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.

14.2.4. Uncategorized Cookies: Other uncategorised cookies are those that are being analysed and have not been classified into a category as yet.

14.2.5. If you follow a link from the Dorset LEP websites to any of external 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.

15. Google Analytics

15.1. Dorset LEP uses **Google Analytics** to analyse the usage of our website.

15.2. Google Analytics uses cookies to collect information about website use.

15.3. You can find more information about Google Analytics in Google's privacy policy here: <https://policies.google.com/privacy>

16. Handling confidential and exempt information

16.1. 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.

16.2. 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 Local Growth Assurance Framework in accordance with the Local Government Act 1972.

16.3. 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.

16.4. 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.

16.5. 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.

16.6. Dorset LEP abides by the information provided by a Government department on terms which forbid the disclosure of the information to the public;

16.7. Where disclosure to the public is prohibited by a court or;

16.8. 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.

17. Publication of Board papers

17.1. 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.

- 17.2. To ensure transparency, Dorset LEP Board papers are published with the following timelines agreed with Government:
- 17.3. Meeting agendas and papers to be published 5 clear working days before the meeting takes place;
- 17.4. 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.
- 17.5. 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](#).

18. Sharing data

- 18.1. 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](#).
- 18.2. 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](#).
- 18.3. Dorset LEP Business customers please note that data may be shared with the Department for Business & Trade and / or nominated partners for research and evaluation purposes.
- 18.4. Dorset LEP does not share your information with anyone else outside of these organisations unless there is a data sharing agreement in place.
- 18.5. 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](#).
- 18.6. 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.
- 18.7. 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.

19. What are your rights?

- 19.1. 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.
- 19.2. You have a right at any time to stop us from contacting you. If you no longer wish to be contacted, please email dorsetlep@bournemouth.ac.uk and we will remove you from any mailing lists.
- 19.3. You can request your information from us at any time by emailing dorsetlep@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.
- 19.4. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:
- 19.5. Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- 19.6. Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- 19.7. Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right here
- 19.8. Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right here
- 19.9. Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right here.
- 19.10. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- 19.11. Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

20. Freedom of information

- 20.1. 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.

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

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

20.4. 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.

21. Complaints

21.1. If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

21.2. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

21.3. The ICO's address:

21.4. Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

21.5. Helpline number: 0303 123 1113

21.6. Website: <https://www.ico.org.uk/make-a-complaint>