Horsham Blueprint
A plan for Horsham

DATA PROTECTION POLICY

Revised and adopted 6 May 2026

Horsham Blueprint Neighbourhood Forum is committed to protecting all information that we handle about people we work with, and to respecting people's rights around how their information is handled. This policy explains our responsibilities and how we will meet them.

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Section A – What this policy is for

1 Policy statement

1.1 Horsham Blueprint Neighbourhood Forum (Horsham Blueprint) is committed to protecting personal data and respecting the rights of our data subjects; the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.

We process personal data to help us:

a) in the implementation, monitoring and updating of the Horsham Blueprint Neighbourhood plan;

b) maintain our list of Horsham Blueprint members, supporters and interested parties;

c) undertake evidence gathering for the purposes of Horsham Blueprint;

d) maintain our records;

e) promote Horsham Blueprint;

f) respond effectively to enquirers and handle any complaints.

1.2 This policy has been approved by Horsham Blueprint Steering Group who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

2 Why this policy is important

2.1 We are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate, as we are aware that people can be upset or harmed if any of these things happen.

2.2 This policy sets out the measures we are committed to taking as an organisation and, what each of us will do to ensure we comply with the relevant legislation.

2.3 In particular, we will make sure that all personal data is:

a) processed lawfully, fairly and in a transparent manner;

b) processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;

c) adequate, relevant and limited to what is necessary for the purposes for which it is being processed;

d) accurate and, where necessary, up to date;

e) not kept longer than necessary for the purposes for which it is being processed;

f) processed in a secure manner, by using appropriate technical and organisational means;

g) processed in keeping with the rights of data subjects regarding their personal data

2.4 Anyone processing personal information on behalf of Horsham Blueprint is required to comply with this policy. If the policy has been breached accidentally the Chair or Secretary of the Horsham Blueprint Steering Group must be informed immediately so swift action can be taken to try and limit the impact of the breach.

2.5 Companies / Organisations working on behalf of Horsham Blueprint who act as a data processor are required to comply with this policy under the contract with us. Any breach of the policy will be taken seriously and could lead to us taking contract enforcement action against the company, or terminating the contract. Data processors have direct obligations under the GDPR, primarily to only process data on instructions from the Horsham Blueprint Neighbourhood Forum Steering Group and to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved.

2.6 Our procedures will be in line with the requirements of this policy, but if you are unsure about whether anything you plan to do, or are currently doing, might breach this policy you must first speak to the Chair or Secretary of the Horsham Blueprint Steering Group.

Section B – Our data protection responsibilities

3 What personal information do we process?

3.1 In the course of collecting evidence for the implementation, monitoring and updating of the Horsham Blueprint Neighbourhood Plan, we may collect and process information (personal data) about many different people (data subjects). This includes data we receive straight from the person if for example, they complete forms or contact us. We may also receive information about data subjects from other sources.

3.2 We process personal data in both electronic and paper form and all this data is protected under data protection law. The only personal data we process are names and contact details (including email addresses) of members, supporters or other interested parties.

3.3 Horsham Blueprint does not and will not hold any information that falls within GDPR “special categories” of data.

4 Making sure processing is fair and lawful

4.1 Processing of personal data will only be fair and lawful when the purpose for the processing meets a legal basis, as listed below, and when the processing is transparent. This means we will provide people with an explanation of how and why we process their personal data at the point we collect data from them, as well as when we collect data about them from other sources.

5 How we can legally use personal data

5.1 Processing of personal data is only lawful if at least one of these legal conditions is met:

a) the processing is necessary for a contract with the data subject;

b) the processing is necessary for us to comply with a legal obligation;

c) the processing is necessary to protect someone's life (this is called "vital interests");

d) the processing is necessary for us to perform a task in the public interest, and the task has a clear basis in law;

e) the processing is necessary for legitimate interests pursued by Horsham Blueprint or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject;

f) If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear consent.

6 What must we tell individuals before we use their data?

6.1 If personal data is collected directly from the individual, we will inform them by means of a "Privacy Notice" about our identity/contact details, the reasons for processing, and the legal basis.

6.2 No information is to be collected from any other source other than directly from the data subject.

6.3 No information will be passed on, other than what is required solely for the implementation, monitoring and updating of the Horsham Blueprint Neighbourhood plan.

7 When we need consent to process data

7.1 Where none of the other legal conditions apply to the processing, and we are required to get consent from the data subject, we will clearly set out what we are asking consent for, Including why we are collecting the data and how we plan to use it. Consent will be specific to each process we are requesting consent for and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data.

7.2 Consent can however be withdrawn at any time and if withdrawn, the processing will stop. Data subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent.

8 Processing for specified purposes

8.1 We will only process personal data for the specific purposes explained in our privacy notices (as described above in section) or for other purposes specifically permitted by law. We will explain those other purposes to data subjects in the way described in, unless there are lawful reasons for not doing so.

9 Data will be adequate, relevant and not excessive

9.1 We will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data “just in case” we want to process it later.

10 Accurate data

10.1 We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

11 Keeping data and destroying it

11.1 We will not keep personal data longer than is necessary for the implementation, monitoring and updating of the Horsham Blueprint Neighbourhood Plan or such time that Horsham Blueprint Neighbourhood Forum is dissolved.

12 Security of personal data

12.1 We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.

12.2 We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing and the sensitivity of the data.

13 Keeping records of our data processing

13.1 To show how we comply with the law we will keep clear records of our processing activities and of the decisions we make concerning personal data (setting out our reasons for those decisions).

Section C – Working with people we process data about (data subjects)

14 Data subjects’ rights

14.1 We will process personal data in line with data subjects' rights, including their right to:

a) request access to any of their personal data held by us (known as a Subject Access Request);

b) ask to have inaccurate personal data changed;

c) restrict processing, in certain circumstances;

d) object to processing, in certain circumstances, including preventing the use of their data for direct marketing;

e) data portability, which means to receive their data, or some of their data, in a format that can be easily used by another person (including the data subject themselves) or organisation;

f) withdraw consent when we are relying on consent to process their data.

14.2 If a member of the Horsham Blueprint Steering Group receives any request from a data subject that relates or could relate to their data protection rights, this will be forwarded to the Chair or Secretary of the Horsham Blueprint Steering Group immediately.

14.3 We will act on all valid requests as soon as possible, and at the latest within one calendar month, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

15 Direct marketing

15.1 We will comply with the rules set out in the GDPR, the Privacy and Electronic Communications Regulations (PECR) and any laws which may amend or replace the regulations around direct marketing[1]. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, telephone (both live and recorded calls) and fax.

15.2 Any direct marketing material that we send will identify Horsham Blueprint Neighbourhood Forum as the sender and will describe how people can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing we will stop the direct marketing as soon as possible.

Section D – working with other organisations & transferring data

16 Sharing information with other organisations

16.1 We will only share personal data with other organisations or people when we have a legal basis to do so and if we have informed the data subject about the possibility of the data being shared (in a Privacy Notice), unless legal exemptions apply to informing data subjects about the sharing.

16.2 We will keep records of information shared with a third party, which will include recording any exemptions which have been applied, and why they have been applied. We will follow the Information Commissioners Office (ICO) statutory code of practice when sharing personal data with other data controllers.

[1] **Direct marketing** means the communication (by any means) of any advertising or marketing material which is directed, or addressed, to individuals. “Marketing” does not need to be selling anything, or be advertising a commercial product. It includes contact made by organisations to individuals for the purposes of promoting the organisation’s aims.

17 Data processors

17.1 Before appointing a contractor who will process personal data on our behalf (a data processor) we will carry out due diligence checks. The checks are to make sure the processor will use appropriate technical and organisational measures to ensure the processing will comply with data protection law.

18 Transferring personal data outside the EU/UK

18.1 Personal data cannot be transferred (or stored) outside of the European Union/UK unless this is permitted by the GDPR. This includes storage on a “cloud” based service where the servers are located outside the EU/UK.

Section E – Managing change & risks

19 Data protection impact assessments (DPIA)

19.1 Horsham Blueprint neighbourhood Forum will not carry out data processing that is likely to result in a high risk.

19.2 High risk situations are those involving the processing data relating to vulnerable people, trawling of data from public profiles, using new technology, and transferring data outside the EU/UK. High Risk data processing requires that a DPIA be conducted.

20 Dealing with data protection breaches

20.1 If Horsham Blueprint Neighbourhood Forum members, supporters, interested parties or contractors working think that this policy has not been followed, or data might have been breached or lost, this will be reported immediately to the Chair or Secretary of the Horsham Blueprint Neighbourhood Forum Steering Group.

20.2 We will keep records of personal data breaches, even if we do not report them to the ICO.

20.3 We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when someone becomes aware of the breach.

20.4 In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

Section F - Archiving in the Public Interest

21 Action upon dissolution of the Horsham Blueprint Neighbourhood Forum

21.1 In order to ensure the long-term availability of our records for historical research and to preserve the collective memory of Horsham Blueprint and the production of the Horsham Blueprint Business Neighbourhood Plan, we will archive records of our proceedings including policies, meetings, events, consultations, policy formulation and statutory engagement which together tell the story of the formation and evolution of Horsham Blueprint.

21.2 We may in this process transfer personal data to the West Sussex Record Office for permanent preservation in the public interest as defined in the Data Protection Act 2018. When data is processed for public interest archiving, certain individual rights including right to erasure and right to rectification may be restricted.