

Wheatley Group Special Category Data Policy

We will provide this policy on request at no cost, translated, in large print, in Braille, on tape or in another non-written format.



We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats, please call us on 0800 479 7979 or email info@wheatley-group.com

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille'a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer 0800 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzi-las em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número 0800 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجاناً مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضاً ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می توانیم اطلاعات را به سایر زبانها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هر یک از این فرمتها، لطفاً از طریق شماره 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو براۓ کرم ہمیں 0800 479 7979 پر کال کریں یا group.com-info@wheatley پر ای میل کریں۔

Approval body	Group Audit Committee
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Customer engagement required	No
Trade union engagement required	Yes
Equality Impact Assessment	No

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1. Introduction

The UK General Data Protection Regulation Data Protection Act 2018 (the Act) requires controllers who process special category (i.e. sensitive) personal data, (or personal data relating to criminal convictions and offences) to have an “appropriate policy document” in place setting out a number of additional safeguards for this data.

More specifically, the Act states that:

“The controller has an appropriate policy document in place in relation to the processing of personal data... if the controller has produced a document which:

- a) explains the controller’s procedures for securing compliance with the principles in Article 5 of the UK GDPR (the UK GDPR) (principles relating to processing of personal data) in connection with the processing of personal data in reliance on the condition in question; and
- b) explains the controller’s policies as regards the retention and erasure of personal data processed in reliance on the condition, giving an indication of how long such personal data is likely to be retained.”

This document is the policy adopted by Wheatley Housing Group and all of its Subsidiaries (the Group) in relation to this processing.

This Policy applies across the Group and is intended to ensure a standardised approach.

2. Objectives of the policy

This Policy aims to ensure that the Group satisfies the requirements of the Data Protection Act 2018 in terms of having in place a policy statement in relation to the additional ‘Safeguards in place where processing Special Category Data’ and data relating to criminal convictions and offences.

3. Policy Statement

Lawfulness, fairness and transparency

We are satisfied that we will have a legal basis for holding the personal data we hold, and that we will also have a valid legal basis for disclosing this personal data to third parties where this happens. Privacy notices have been drafted to comply with the UK GDPR's requirements (and to reflect the legal basis of processing). Privacy notices are published on Wheatley Housing Group and subsidiary websites and are available in paper copy on request.

Purpose limitation

The purposes for which data is collected are clearly set out in the relevant privacy notices. This includes reference to further use of data for internal management information purposes. A limited set of data is required for research and archiving purposes; the Group and its subsidiaries have put in place appropriate safeguards for these activities as required by Article 89 of the UK GDPR.

Data minimisation

The Group use the minimum data to achieve the purposes for which we process the data.

Accuracy

The Group is continually checking data for accuracy and, where any inaccuracies are discovered, these are promptly corrected and any third party recipients of the inaccurate data notified of the correction.

Lawfulness, fairness and transparency

The Group only keep personal information for the minimum amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on business need. We maintain retention schedules which set out how long we hold different types of information. You can obtain a copy of our retention schedules by emailing us at InformationRequests@wheatley-group.com.

Integrity and confidentiality

The Group has an approved Data Protection Policy, applicable to all its subsidiaries. These set out roles and responsibilities within the organisation in relation to data protection and information security. All staff are required to take data protection and information security training. Our IT systems have appropriate protective measures in place incorporating defence in depth and the systems are subject to external assessment and validation.

4. Disclosure

The Group is subject to the terms of the Freedom of Information (Scotland) Act 2002 ('FOISA') and the Environmental Information (Scotland) Regulations 2004 ('the EIRs'). These provide individuals with the right of access to information held by the Group, including this policy, and any information on matters relating to, or arising out of, this policy.

5. Training

Employees will be made aware of this Policy through Wheatley Group's Data Protection Training and further training and support will be provided to staff, where required, by the Information Governance Team.

6. Record keeping

There are no specific record keeping requirements arising from this policy.

7. Policy review

We will review this Policy every 3 years. More regular reviews will be considered where, for example, there is a need to respond to new legislation or guidance.