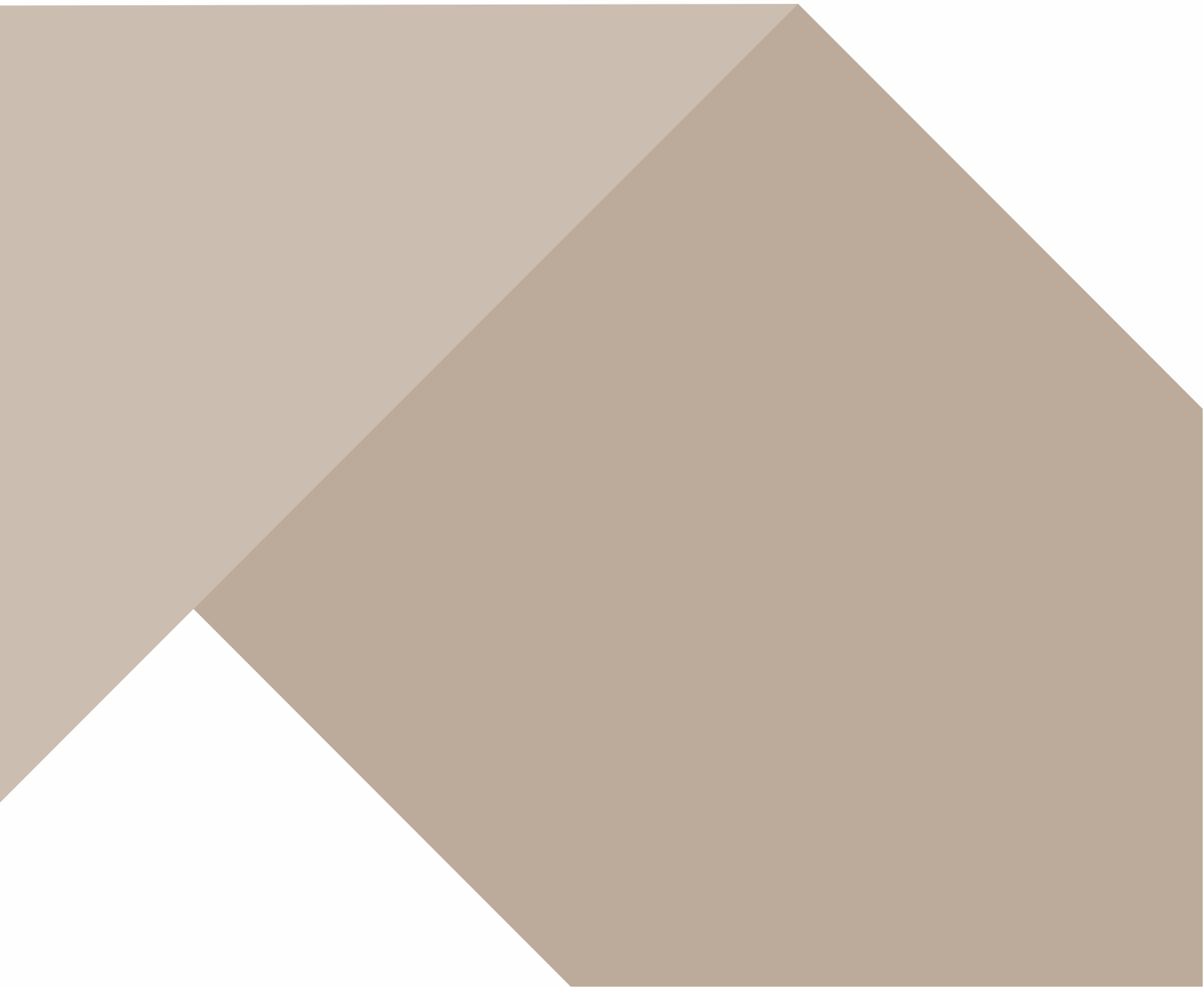


Wheatley Group Special Category Data Policy

August 2022



We can produce information on request in large print, Braille, tape and on disk. It is also available in other languages. If you need information in any of these formats please contact us on Freephone 0800 479 7979.

如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979。

Si vous nous le demandez, nous pouvons vous remettre ces informations en d'autres langues, en braille ou sur cassette. Si vous souhaitez que ces informations vous soient fournies sous l'un de ces formats, contactez-nous en composant le 0800 479 7979.

چنانچه مایل باشید می‌توانید این مطالب را به فارسی یا زبان‌های دیگر و همچنین بریل و یا بر روی نوار کاست دریافت دارید. در صورت نیاز خواهشمندیم با شماره تلفن 0800 479 7979 با ما تماس بگیرید.

ਜੇ ਤੁਸੀਂ ਸਾਨੂੰ ਬੇਨਤੀ ਕਰੋ ਤਾਂ ਅਸੀਂ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾਵਾਂ, ਬ੍ਰੇਲ (ਨੋੜਹੀਣਾ ਲਈ ਭਾਸ਼ਾ) ਵਿੱਚ, ਜਾਂ ਟੇਪ ਉੱਪਰ ਦੇ ਸਕਦੇ ਹਾਂ। ਜੇ ਤੁਹਾਨੂੰ ਇਨ੍ਹਾਂ ਵਿੱਚੋਂ ਕਿਸੇ ਰੂਪ ਵਿੱਚ ਚਾਹੀਦੀ ਹੋਵੇ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 0800 479 7979 ਨੰਬਰ ਤੇ ਸੰਪਰਕ ਕਰੋ।

Na Pana/Pani życzenie możemy zapewnić te informacje w innych językach, alfabetem Braille'a lub na kasecie. Jeśli chciał(a)by Pan(i) uzyskać te informacje w którejś z tych form, prosimy skontaktować się z nami pod numerem telefonu 0800 479 7979.

Haddii aad na weydiisato waxaanu warbixintan kugu siin karaa iyadoo ku qoran luuqad kale, farta ay dadka indhaha la' akhriyaan ama cajalad ku duuban. Haddii aad jeclaan lahayd in warbixintan lagugu siiyo mid ka mid ah qaababkaas, fadlan nagala soo xidhiidh telefoonka 0800 479 7979.

По вашей просьбе данная информация может быть предоставлена на других языках, шрифтом Брайля или в аудиозаписи. Если вам требуется информация в одном из этих форматов, позвоните нам по номеру 0800 479 7979.

Approval body	Group Audit Committee
Date of approval	03/08/2022
Review Year	2025
Customer engagement required	No
Trade union engagement required	No
Equality Impact Assessment	No

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1. Introduction

With effect from 25 May 2018, data protection law requires controllers who process special category (i.e. sensitive) personal data, (or personal data relating to criminal convictions and offences) under various parts of the Data Protection Act 2018 to have an “appropriate policy document” in place setting out a number of additional safeguards for this data.

More specifically, the law 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 General Data Protection Regulation (EU) 2016/679 (the 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 the Wheatley Group and its Subsidiaries in relation to this processing. The Wheatley Group’s Subsidiaries are listed in our website under <https://www.wheatley-group.com/about-wheatley/about-us/group-partners>.

This Policy shall apply 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

All personal data flows into and out of the Wheatley Group are being assessed to determine the legal basis under which that data is processed and the results of the assessment are being documented. 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). Please see each Subsidiary website for further details. We are presently updating our data processor agreements and data sharing agreements to reflect the new legal requirements.

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 Wheatley Group and its subsidiaries have put in place appropriate safeguards for these activities as required by Article 89 of the GDPR.

Data minimisation

In assessing the data flows, the Wheatley Group and its subsidiaries are using the opportunity to critically assess the need for each of the data fields in question and where superfluous data is being captured, we will stop capturing this.

Accuracy

The Wheatley Group and its subsidiaries are 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 Wheatley Group and its subsidiaries 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 Wheatley 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 any information held by the Group, including this policy, and any information on matters relating to, or arising out of, this policy.

For more information, please see the Group's FOI policy or Data Protection policy which can be found on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages.

5. Training

Employees will be made aware of this Policy and training and support will be provided where applicable.

6. Record keeping

There are no specific record keeping requirements arising from this policy. The policy is designed to be outwards facing.

7. Policy review

This Policy may only be changed or varied with the specific authority of the Group Board or Group Audit Committee.

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/Policy guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this Policy on our website. A hard copy is available on request. Customers can also get a copy of the Policy on tape, in Braille, in large print or in translation on request.