

Confidentiality and Data Protection Policy

1.0 Introduction

1.1 The Wrekin Housing Group (the Group) holds a large amount of personal data and is committed to protecting the privacy of all individuals by complying with data protection legislation. The Confidentiality and Data Protection Policy and Procedure sets out the Group's approach to data protection and how personal information is to be collected, used, shared and stored. The Information Commissioner, an independent body, is responsible for enforcing data protection law.

2.0 Policy Statement

2.1 The rights to privacy and confidentiality that tenants, leaseholders, housing applicants, service users, employees, officers and contractors have will be protected to ensure that personal information relating to them is dealt with confidentially and sensitively, and in accordance with the law. Likewise, the confidentiality of commercially sensitive information relating to the Group and other businesses will be preserved.

2.2 The Group will comply with the terms of the General Data Protection Regulations 2016 ("GDPR") and all personal data will be handled in accordance with the 'Six Principles of Data Protection'.

2.3 Data protection principles cut across all Group activities and guidance for staff is available in the Group's Data Protection and Confidentiality Procedure. More specific guidance relating to particular areas of Group business is provided in additional policies and procedures. These include:

- Employment - covered in the Recruitment and Selection Policy and Procedure;
- Data Security and handling – covered in policies and procedures managed by the ICT Consultancy;
- Information Sharing – the Group enters into a number of information sharing agreements with third parties for example, with the Police and different Local Authority departments.

3.0 Policy Scope

3.1 This policy applies to all employees of The Wrekin Housing Group including Board members and volunteers.

4.0 Definitions

4.1 Employee Privacy Notice - the privacy notice relevant to employees of The Wrekin Housing Group, setting out how data collected in connection with their employment will be used and processed and is available to all employees.

4.2 Customer Privacy Notice - the privacy notice relevant to customers of The Wrekin Housing Group, setting out how data collected in connection with the operation of our business will be used and processed and available on the Group's website.

4.3 The GDPR Working Group - the working group comprising of the Group's Data Protection Officer (DPO), representatives of the Legal Department, representatives of the IT Department and representatives of Care and Support. The Group oversee any issues or changes in legislation/regulation relating to data protection and confidentiality.

5.0 Roles and Responsibilities

5.1 The **Director of Business Solutions** is responsible for approving updates to the Customer Privacy Notice and the Employee Privacy Notice.

5.2 The **Legal Services Manager** and the **Head of ICT** are responsible for putting relevant policies and procedures in place. The Group is registered as a data controller with the Information Commissioner and the Group Head of ICT, who is also the Group's Data Protection Officer, is responsible for completing the annual registration.

5.3 The **GDPR Working Group** will agree and produce or procure content for training provided to employees, both as part of induction and ongoing refresher training. They will also propose changes to the Customer Privacy Notice or Employee Privacy Notice as appropriate.

5.4 **Managers** are responsible for providing basic information and training to all employees, including volunteers and involved residents, regarding confidentiality and data protection.

5.5 **All Group employees** are responsible for following this policy and all associated procedures.

6.0 Information to be kept confidential

6.1 The following types of information are to be kept confidential:

- Personal data and special category data are not to be disclosed outside of the Group except as outlined in the Confidentiality and Data Protection Procedure and disclosed inside the Group only when necessary;
- Commercially sensitive data shall not be shared outside of the Group unless required by legislation or the Regulator. The Board and Executive Management Group will ensure that all employees are aware of the aims, activities and plans that may affect them;
- Board papers and minutes will be confidential and not made available unless the Board, or the persons designated by the Board, decide otherwise;
- All financial information relating to the Group's performance is commercially sensitive data and should not be disclosed outside of the

Group except where required to do so by the Group's Regulators and to the extent published with the Board's authority.

7.0 Accessibility

7.1 The Group will:

- Respond to a reasonable request for information and make data available that is not personal data, sensitive personal data or commercially sensitive data within a reasonable time;
- Ensure information is provided in a clear and non-discriminatory way that meets the needs of tenants, service users and other key stakeholders;
- Make reasonable adjustments for individuals who need these;
- Comply with legal and regulatory requirements to provide information.

The Wrekin <u>Housing Group</u>	Policy Control Sheet Confidentiality and Data Protection Policy Policy reference number - 2024/017
Policy Author	Jo Webb Legal Services Manager
Direct Lead	Jan Lycett Executive Director of Business Solutions
Version	2.0 – July 2024
Target audience	Employees of The Wrekin Housing Group
Consultation	Wrekin Voices Customer Committee Employee Forum Senior Managers Executive Management Group
Date of Equality Impact Assessment	An EIA was completed on the 9 th April 2024.
Date of Data Privacy Impact Assessment	This policy outlines how the Group will comply generally with data protection legislation and individual DPIAs are in place where specific data processing activities require one.
Approving Body	Audit & Assurance Committee
Date of final approval	24 th July 2024
Implementation date	July 2024
Monitoring arrangements	To be reviewed and updated in accordance with any legislative changes and/or ICO guidance.
Reporting	Material breaches – Audit & Assurance Committee
Review date	January 2027
Expiry date	July 2027
Review cycle	Three year review cycle
Policy category	GDPR / Data Protection
Associated policies and procedures	Confidentiality and Data Protection Procedure Confidentiality Agreement Allocations and Lettings Policy ASB Policy / Procedure CCTV Policy / Procedure Complaints Policy / Procedure Consent to Care and Treatment Policy Customer Privacy Notice / Employee Privacy Notice Data Loss and Data Breach Reporting Procedure Guidance on completing the Confidentiality Agreement Information Security and Data Loss Policy Information Security Procedure Information Sharing Agreement (Police) Mental Capacity Policy Person Centered Planning Policy

	Recruitment and Selection Policy / Procedure Safeguarding Policy Safeguarding Procedure Subject Access Request Policy / Procedure
Policy location	Sharepoint The Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Caroline Guy	Policy reviewed in line with review cycle	1.0 - July 2021	Audit & Assurance Committee – 29 th July 2021
Jo Webb	Policy reviewed in line with review date	2.0 - July 2024	Audit & Assurance Committee – 24 th July 2024