



Committee Approver	Board of Management
Stakeholder Consultation	Executive Team, Data Protection Officer and Board of Management
Date Approved	May 2021
Classification	Policy
Title	Privacy Policy
Revision Date	May 2021
Revised by	Head of Business Support
Next Revision Date	May 2024
Related Documents	Privacy Procedure, Subject Access Request Procedure, Data Retention Policy
Location of Electronic Copy	F:\Live Policies\Corporate

1. Viewpoint's Values

Viewpoint is here to help people enjoy their later years. Everything we do is about realising this vision, which is supported by the following straightforward set of values:

- Inspire with positive smiles and words;
- Say 'yes I can and I will';
- Celebrate age, experience and wisdom;
- Do according to our customers' wishes and ambitions;
- Treat people (everyone is a VIP) as we would a "loved one";
- Work hard, have fun and laugh;
- Stay courageous, creative and ahead of the game; and
- Work with those that share our values.

These promises shape us. They are a commitment to our residents, staff and suppliers. They are fundamental to every single plan, decision and project we embark on.

Ensuring that we have systems and processes in place to manage risk effectively will support us to deliver those plans, decisions and projects, in accordance with our vision and values.

2. Policy Statement

We will ensure the secure and safe management of data held by us in relation to customers, staff and other individuals.

3. Aim (sometimes called Purpose)

Viewpoint manages a significant amount of data, from a variety of sources. This contains data from which a living individual can be identified either by that data alone, or in conjunction with other data held by Viewpoint ('Personal Data') and data that is sensitive in nature, i.e. relates to or reveals a data subject's racial or ethnic origin, religious beliefs, political opinions, relates to health or sexual orientation ('Special Category Personal Data')

The purpose of Viewpoint's Privacy Policy, and the associated policies, procedures and documentation which support it, is to ensure that we gather and use Personal Data and Special Category Personal Data about individuals, including customers (tenants, factored owners, residents etc.), employees and

other individuals that Viewpoint has a relationship with, in accordance with relevant legal and best practice expectations.

4. Legislation/related policies

It is a legal requirement that Viewpoint processes data correctly; we must collect, handle and store personal information in accordance with the relevant legislation.

The relevant legislation in relation to the processing of data is:

- The Data Protection Act 2018;
- General Data Protection Regulation (EU) 2016/679 as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (UK GDPR);
- The Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications); and
- Any judicial or administrative implementation of any of the above, any guidance, guidelines, codes of practice, codes of conduct or approved certification mechanisms issued by the Information Commissioner, or other regulatory or supervisory authority responsible for administering Data Protection Laws.

This policy complies with the Scottish Housing Regulator Regulatory Framework Standard 1.2 which states:

‘The RSL’s governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL’

This policy should be read in conjunction with the following related policies and procedures:

- Privacy Procedure;
- Subject Access Request Procedure;
- Data Retention Policy;
- ICT System Security Policy & Procedures;
- Data Breach Procedure; and
- Privacy Impact Assessment.

5. Scope

This policy applies to all Viewpoint Board Members, employees, and third parties processing data on Viewpoint's behalf.

6. Compliance & Support

Board

The role of Viewpoint's Board is to ensure that this policy, as well as any associated policies, are regularly reviewed, as required, or in accordance with the usual cycle of policy review.

The Board will, in fulfilling its function, ensure that it complies as necessary with this policy, and the associated policies, procedures and documentation which support it.

Executive and Leadership Teams

The role of the Executive and Leadership Teams is responsibility for ensuring that this policy, and the associated policies, procedures and documentation which support it, are implemented within Viewpoint.

The Executive and Leadership Teams shall ensure that data management processes and systems are in place, and that they are operated properly from day-to-day.

The Executive and Leadership Teams shall also ensure that relevant managers and team members familiarise themselves with this policy, and the associated policies, procedures and documentation which support it, as well as undertaking any associated training.

Staff

All staff are responsible for ensuring that they familiarise themselves with this policy, and the associated policies, procedures and documentation which support it, as well as undertaking any associated training.

All staff shall also ensure that implement data management processes and systems as relevant to their job role, and should escalate any risks or concerns as appropriate.

7. Equality Impact Assessment (EIA)

No potential equalities issues have been identified in relation to the review of this policy, and consequently an EIA has not been completed.

8. Privacy Impact Assessment (PIA)

This policy, as well as the associated policies, procedures and documentation which support it, mitigates the risks associated with the processing of personal data, including via the completion of Privacy Impact Assessments as necessary.

9. Monitoring & Evaluation

Viewpoint's Board, staff members, and those who process data on Viewpoint's behalf, will ensure compliance with the terms of this policy, as well as associated policies, procedures and documentation, and will manage individuals' data in accordance with the procedures outlined therein.

Viewpoint's Data Protection Officer will monitor compliance with this policy through regular data protection audits.

Viewpoint's Data Protection Officer and Exec Team will ensure that regular reports on data protection matters are provided to the Board, including reports on exceptional incidents such as data breaches.

The CEO will ensure that this policy is reviewed at least every three years.