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# Data Protection Policy

<b>Department</b>	<b>Information Security</b>
<b>Policy Owner</b>	<b>Sandra Smith – Data Protection Officer</b>
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<b>Version Number</b>	<b>5.0</b>

## **Purpose**

To ensure the organisation processes data lawfully and has the necessary resources to do so.

## **1 Introduction**

This policy covers Data Protection legislation meaning all applicable data protection and privacy legislation in force from time to time in the UK including and without limitation the Data Protection Act 2018 (DPA); the UK GDPR.

## **2 Policy Statement**

2.1 Flagship Housing Group Limited including all subsidiaries (collectively Flagship Group) is committed to compliance with the DPA which limits the use of personal data and protects the 'rights and freedoms' of individuals whose information Flagship Group collects and processes.

2.2 Compliance with the DPA is described in this policy and should be read in conjunction with relevant policies such as the IT Security Policy, and along with connected processes and procedures.

2.3 The DPA and this policy apply to all of Flagship Group personal data processing functions, including those performed on customers,' employees,' suppliers,' and partners' personal data and any other personal data the organisation processes from any source.

2.4 This policy applies to all employees and interested parties of Flagship Group such as outsourced suppliers. Any breach of the DPA will be dealt with in accordance with the company disciplinary procedure and may also be a criminal offence, in which case the matter will be reported as soon as possible to the appropriate authorities.

## **3 Data Protection principles and subjects' rights**

We are committed to ensuring that we comply with the six data protection principles, the accountability principle, and the rights of data subjects (referred to in the Data Protection Procedure).

## **4 Responsibilities and Roles under Data Protection Legislation**

4.1 Flagship Group is a Data Controller (alone or jointly with others, determines the purposes and means of processing personal data) and Data Processor (processes personal data on behalf of the Controller) under the DPA. (Flagship is a Data Controller and Data Processor, Gasway is a Data Controller and Data Processor, Hopstead is a Data Controller).

4.2 The Data Controller is responsible for and being able to demonstrate compliance.

4.3 Executive Directorate and all those in managerial or supervisory roles throughout Flagship Group are responsible for developing and encouraging good information handling practices within Flagship Group.

- 4.4 The Data Protection Officer, a role specified in the DPA, is responsible for:
- informing and advising about obligations to comply with Data Protection Law,
  - monitoring compliance in line with Flagship data protection policy and procedures,
  - providing advice relating to Privacy Impact Assessments,
  - raising awareness of data protection issues,
  - conducting internal assessments,
  - acting as the point of contact for the ICO and cooperating with the ICO.
- 4.5 The Data Protection Team is responsible for logging and completing Subject Access Requests (SAR), Breach notifications and acts as the first point of contact for all general data protection queries.
- 4.6 The Data Protection Champions are the first point of contact for Data Protection queries within their specific team.
- 4.7 Compliance with the DPA is the responsibility of all employees of Flagship Group who process personal data.
- 4.8 Flagship's Data Protection Training Procedure sets out specific training and awareness requirements in relation to specific roles and Employees of Flagship Group generally.
- 4.9 Employees of Flagship Group are responsible for ensuring that any personal data about them and supplied by them to Flagship Group is accurate and up to date.

## **5 Policy Objectives**

The policy's objectives are to:

- Protect the personal data interests of individuals and using appropriate procedures and controls
- Provide the supporting framework for achieving and maintaining compliance
- Ensure Flagship Group meets applicable statutory, regulatory, contractual and/or professional duties

## **6 Further detail**

- Data Protection Procedure
- Data Protection Training Procedure
- Data Breach Notification Procedure
- Processing of Personal Information Procedure
- Right of Access Procedure
- Privacy notices
- Data flow procedure
- Managing Third-Party Contracts Procedure
- Data Privacy Impact Assessment (DPIA) Procedure
- IT Security Policy

## 7 Measuring Effectiveness

Monitor changes in data protection legislation, data breaches, privacy impact assessments, contracts, legitimate interest assessments, data flows that include personal information, privacy notices, data limitation (retention schedule vs current practice), data accuracy, training, information rights request, technical and organisational measures (risk assessments, DP, and cyber questionnaires).

## 8 Review

This Policy will be reviewed as necessary and at least every two years by Flagship Group Data Protection Officer. Any changes made to the policy will be approved by the Governance, Audit and Risk Committee