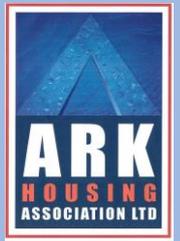




Privacy and Data Protection Policy



Contents

1.0 ARKs Values.....	2
2.0 Purpose	2
3.0 Policy Statement	2
4.0 Scope.....	3
5.0 Legal/Regulatory Framework.....	3
6.0 Responsibilities	3
6.1 Board of Management.....	3
6.2 Executive Team	3
6.3 Senior Leadership Team.....	4
6.4 Managers	4
6.5 All Staff.....	4
6.6 Third Parties	4
7.0 Related Policies & Procedures	4
8.0 Equality Impact Assessment (EIA).....	4
9.0 Data Protection Impact Assessment (DPIA).....	4
10.0 Stakeholder Consultation.....	5
11.0 Monitoring and Review.....	5
11.1 Monitoring	5
11.2 Review.....	5

1.0 ARKs Values

Our organisational values are the basis for everything that we do, from providing housing, care and support to tenants and people who use our services to ensuring that staff have clear standards of performance set. ARK believes that everyone should have the opportunity to lead a happy, healthy and safe life. We value:

- The worth of each person;
- Trusting relationships;
- Understanding difference;
- Challenging oppression;
- Personal and organisational accountability;
- Caring for our physical environment; and
- Enjoyment.

2.0 Purpose

The purpose of this policy is to confirm our commitment to ensuring the secure and safe management of data held by us in relation to customers, staff and other individuals, and to set out our duties in processing and managing that data.

3.0 Policy Statement

ARK will put in place measures to ensure that we comply with relevant legal requirements, and in particular we will ensure that:

- We process personal data only in accordance with the relevant lawful basis for processing and that we issue appropriate Fair Processing Notices when processing individuals' data;
- We communicate to all relevant individuals whose data we process, and comply with their legal rights, including their right to access their data via subject access requests, their right to be forgotten, and their right to restrict or object to processing;
- All Personal Data held by us is stored securely, whether electronically or in paper format;
- Where data is shared with third party organisations, including organisations which process data on ARK's behalf, relevant data processing agreements or addendums are put in place;
- We carry out a Data Protection Impact Assessment before undertaking a project or processing activity which poses a "high risk" to an individual's privacy; and

- We handle and report data breaches in accordance with the relevant legal requirements.

4.0 Scope

All Board of Management Members and employees are required to abide by this policy.

5.0 Legal/Regulatory Framework

It is a legal requirement that we process data correctly, and we will collect, handle and store personal information in accordance with the relevant legislation.

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

- the General Data Protection Regulation (EU) 2016/679 (“the 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 legislation that, in respect of the United Kingdom, replaces, or enacts into United Kingdom domestic law, the General Data Protection Regulation (EU) 2016/679, the proposed Regulation on Privacy and Electronic Communications or any other law relating to data protection, the processing of personal data and privacy as a consequence of the United Kingdom leaving the European Union.

6.0 Responsibilities

6.1 Board of Management

ARK’s Board of Management is responsible for consideration and approval of this policy, and for ensuring that where relevant its decisions are taken in accordance with relevant legislation, training and guidance.

6.2 Executive Team

ARK’s Executive Team is responsible for ensuring that this policy is reviewed in accordance with ARK’s schedule for review of policies, or sooner if required.

6.3 Senior Leadership Team

ARK's Senior Leadership Team is responsible for review of the policy, and for ensuring that relevant measures are put in place in order to implement its requirements.

6.4 Managers

ARK Managers will be responsible for the effective implementation of this policy, and the Privacy and Data Protection Procedure which supports it, within their area of responsibility. They must also ensure that each member of their staff, through induction and e-learning, is made aware of this policy and participates in relevant training.

6.5 All Staff

All ARK employees are required to familiarise themselves with this policy, and the Privacy and Data Protection Procedure which supports it, and comply with its provisions, as well as undertake any training implemented in association with this policy.

6.6 Third Parties

ARK will ensure that relevant third parties are familiar with, and abide by, the terms of this policy as necessary.

7.0 Related Policies & Procedures

This policy should be read in accordance with ARK's Privacy and Data Protection Procedure (G48).

8.0 Equality Impact Assessment (EIA)

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

9.0 Data Protection Impact Assessment (DPIA)

No potential high risk data protection implications have been identified in relation to the development of this policy, which in fact is designed to mitigate risk, and consequently a DPIA has not been completed.

10.0 Stakeholder Consultation

In developing this policy the following groups were consulted:

- ARK Board of Management;
- ARK Executive Team; and
- ARK Senior Leadership Team.

11.0 Monitoring and Review

11.1 Monitoring

ARK's Executive and Senior Leadership Teams will monitor implementation of this policy on an ongoing basis, with relevant support from ARK's Data Protection Officer.

11.2 Review

This policy will be reviewed within 3 years from the date of approval by our Board of Management, in accordance with ARK's policy review framework.