

NORTH VIEW Housing Association

1

North View is a registered Scottish charity – charity registration number SC032963

POLICY

DATA PROTECTION

'Passed:-	24/05/2023	Review Date:-	April 2026
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All North View policies and publications can be made available on CD/data-to-voice, in Braille, large print and community languages.

For further details please contact us on 0141 634 0555 or email us on enquiries@nvha.org.uk.

1. Introduction

North View Housing Association (hereinafter the “Association”) is committed to ensuring the secure and safe management of data held by the Association, as data controller, in relation to customers, staff and other individuals. The Association’s staff members have a responsibility to ensure compliance with the terms of this policy, and to manage individuals’ data in accordance with the procedures outlined in this policy.

The Association needs to gather and use certain information about individuals. These can include customers (tenants, factored owners etc.), employees and other individuals that the Association has a relationship with. The Association manages a significant amount of data, from a variety of sources. This data contains personal data and special categories of personal data.

This policy sets out the Association’s duties as data controller in processing that data.



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NORTH VIEW Housing Association

2

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POLICY

DATA PROTECTION

2. Legislation

It is a legal requirement that the Association collect, handle and store personal data in accordance with the relevant data protection legislation, including:

- (a) the UK General Data Protection Regulation (UK GDPR) and
- (b) any other law relating to data protection, the processing of personal data and privacy from time to time.

3. Personal data

- 3.1 The Association holds a variety of data relating to individuals, including customers and employees (also referred to as data subjects) which is known as personal data. The personal data held and processed by the Association is detailed within the fair processing notices (FPN) that have been provided to the Association's customers and employees and other data subjects.
- 3.2 "Personal data" is data from which relates to a living individual or from which a living individual can be identified, either by that data alone or in conjunction with other data held by or available to the Association. An example would be a tenant's name or the address of a property.
- 3.3 The Association also holds special categories of personal data that is sensitive in nature. This is personal data which relates to or reveals a data subject's racial or ethnic origin, religious beliefs, political opinions, health or sexual orientation.



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NORTH VIEW Housing Association

3

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POLICY

DATA PROTECTION

4. Processing of personal data

4.1 Data protection legislation applies to the “processing” of personal data by the Association. “Processing” includes anything that is done with or to personal data by the Association, from its collection or creation through to its destruction.

4.2 The Association must process personal data in accordance with the data protection principles contained in the data protection legislation. These require the Association to:

- 4.2.1 process personal data lawfully, fairly and in a transparent manner;
- 4.2.2 collect personal data for specified, explicit and legitimate purposes only, and not to process it in a way that is incompatible with those legitimate purposes;
- 4.2.3 only process the personal data that is adequate, relevant and necessary for the relevant purposes;
- 4.2.4 keep accurate and up to date personal data, and take reasonable steps to ensure that inaccurate personal data is deleted or corrected without delay;
- 4.2.5 keep personal data for no longer than is necessary for the purposes for which the data is processed; and
- 4.2.6 take appropriate technical and organisational measures to ensure that personal data is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

4.3 The Association may only process personal data if it has a legal reason(s) to do so. These include where the processing:



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NORTH VIEW Housing Association

4

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POLICY

DATA PROTECTION

- has been agreed to by the data subject;
- is necessary for the performance of a contract between the Association and the data subject or for entering into a contract with the data subject;
- is necessary for the Association's compliance with a legal obligation;
- is necessary to protect the vital interests of the data subject or another person; or
- is necessary for the purposes of the Association's legitimate interests except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject.

4.4 In determining whether the Association can rely on its legitimate interests as the legal reason, the Association will conduct a legitimate interests' assessment and keep a record of it to justify its decision. The Association will keep the assessment under review and repeat it if circumstances change.

4.5 Except where the processing of personal data is based on consent, the Association must generally be satisfied that the processing is necessary for the relevant legal reason (i.e. there is no other reasonable way to achieve that purpose).

4.6 Fair Processing Notices (FPN)

The Association has produced FPNs, which it is required to provide to all data subjects whose personal data is held by the Association. The relevant FPN, or a summary of it with clear instructions on how to access the full document, must be provided to data subjects from the outset of processing their personal data.



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5

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POLICY

DATA PROTECTION

4.7 Employees

Employee personal data and, where applicable, special categories of personal data is held and processed by the Association. Details of the personal data held and processing of that data is contained within the employee FPN, which is provided to employees at the same time as their contract of employment. Existing employees have already been provided with this FPN.

4.8 Consent

Consent as a legal reason for justifying the Association's processing of personal data will require to be used where there is no other legal reason to justify the Association's processing of personal data. A data subject consents to the processing of their personal data if they indicate agreement either by a statement or positive action. Consent requires affirmative action, so silence, pre-ticked boxes or inactivity are unlikely to be enough. If consent is given in a document which deals with other matters, then consent must be kept separate from those other matters. Data subjects must be easily able to withdraw consent at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if personal data is to be processed for a different and incompatible purpose which was not disclosed when the data subject first provided their consent via the relevant FPN. The Association need not obtain consent in writing, but it must retain a record of the consent for accountability and audit trail purposes. The consent provided by the data subject must be freely given and the data subject must not be forced to consent. Any consent to be obtained by the Association must be for a specific and defined purpose (i.e. general



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6

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POLICY

DATA PROTECTION

consent cannot be sought for all of the Association's personal data processing).

4.9 Processing of special categories of personal data

The Association may only process special categories of personal data if it has a legal reason(s) to do so. These include where the processing:

- has been explicitly agreed to by the data subject for a specified purpose;
- is necessary for carrying out obligations or exercising rights related to employment or social security;
- is necessary to protect the vital interest of the data subject or, if the data subject is incapable of giving consent, the vital interests of another person;
- is necessary for the establishment, exercise or defence of legal claims;
- is necessary for reasons of substantial public interest; and
- the personal data has been manifestly made public by the data subject.

4.10 Before processing any new special categories of personal data, staff must notify the Data Protection Officer (DPO) of the proposed processing in order that the DPO may assess whether one or more of the above legal reasons is satisfied. Staff must not process the special categories of personal data until the DPO has carried out this assessment and the data subject has been informed by way of FPN of the purposes for which it is being processed and the legal reasons for it.



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NORTH VIEW Housing Association

7

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POLICY

DATA PROTECTION

5. Data Sharing

- 5.1 The Association requires to share personal data with various third parties as part of its day-to-day business.
- 5.2 The Association and the third party will both be processing shared personal data as data controllers.
- 5.3 To regulate the relationship between the Association and the third party, the Association will enter into a data sharing agreement in accordance with the terms of the Association's model data sharing agreement with the third party, governing the sharing of personal data, what personal data will be shared, when and how it will be shared, data security and handling and responsibility for data security breaches.

6. Data Processors

- 6.1 A data processor is a third party that processes personal data on behalf of the Association. Data processors are frequently engaged if certain of the Association's work is outsourced, such as maintenance and repair works, IT services and professional services, including legal advice and HR.
- 6.2 A data processor must comply with data protection legislation and must enter into a data processing addendum with the Association. The Association's data processors must ensure, amongst other things, that they have appropriate technical and organisational security measures in place, maintain records of processing activities and notify the Association if a data security breach occurs.



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NORTH VIEW Housing Association

8

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POLICY

DATA PROTECTION

- 6.3 If a data processor wishes to sub-contact their processing to another party, prior written consent of the Association must be obtained. Upon a sub-contracting of processing, the data processor will be liable in full to the Association for the data protection breaches of their sub-contractors.
- 6.4 Before any new agreement involving the processing of personal data by a data processor is entered into, or an existing agreement is amended, staff must seek approval of its terms by the DPO.

7. Data Storage and Security

All personal data held by the Association must be stored securely, whether in paper or electronic format.

7.1 Paper Storage

If personal data is stored on paper, it should be kept in a secure place where unauthorised parties cannot access it. Employees should make sure that no personal data is left where unauthorised parties can access it. When the personal data is no longer required, it must be disposed of securely by the employee via shredding. If the personal data requires to be retained on a physical file, then the employee should ensure that it is affixed to the file which is then stored in accordance with the Association's storage provisions.

7.2 Electronic Storage

Personal data stored electronically must also be protected from unauthorised use and access. Electronic personal data should be password protected when being sent internally or externally to the Association's data processors or those with whom the Association has



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NORTH VIEW Housing Association

9

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POLICY

DATA PROTECTION

entered in to a data sharing agreement. If electronic personal data is stored on removable media (CD, DVD, USB memory stick), then that removable media must be encrypted and stored securely at all times when not being used. Personal data should not be saved directly to mobile devices and should be stored only within designated areas of the servers.

8. Data security breaches

- 8.1 A data security breach is defined by data protection legislation as being any breach of security leading to the unauthorised or unlawful destruction, loss, alteration, disclosure of or access to personal data.
- 8.2 A data security breach can assume many forms, including loss or theft or equipment on which personal data is stored, unauthorised access or use of personal data or human error, such as sending an e-mail to the incorrect e-mail address.
- 8.3 A data security breach can occur at any point when handling personal data, and the Association is subject to legal reporting duties in the event of a data security breach or potential data security breach occurring.
- 8.4 The Association will use appropriate technical and organisational security measures to keep personal data secure against data security breaches. These may include:
- 8.4.1 ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services;



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NORTH VIEW Housing Association

10

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POLICY

DATA PROTECTION

8.4.2 ensuring that, in the event of a physical or technical incident, availability and access to personal data can be restored in a timely manner; and

8.4.3 a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

8.5 The Association will:

8.5.1 make the required report of a data security breach to the Information Commissioner's Office (ICO) without undue delay and, where possible, within 72 hours of becoming aware of it, if it is likely to result in a risk to the rights and freedoms of data subjects; and

8.5.2 notify the affected data subjects, if a data security breach is likely to result in a high risk to their rights and freedoms and notification is required by law.

9. DPO

9.1. A DPO is an individual who has an over-arching responsibility and oversight with regard to compliance by the Association with data protection legislation. The Association has elected to appoint a DPO, whose details are contained within the FPNs issued to data subjects.

9.2 The DPO is responsible for:



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NORTH VIEW Housing Association

11

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POLICY

DATA PROTECTION

- 9.2.1 advising on and monitoring the Association's compliance with data protection legislation and relevant policies on data protection;
- 9.2.2 training staff on data protection legislation and undertaking compliance audits;
- 9.2.3 providing advice in relation to data protection impact assessments and monitoring their performance;
- 9.2.2 co-operating with and serving as the Association's contact for discussions with the ICO and data subjects; and
- 9.2.3 being involved in managing and responding to data security breaches and notifying the same to the ICO and data subjects in accordance with this policy.

10. Data subject rights

10.1 Certain rights are provided to data subjects under the data protection legislation. These rights are notified to the Association's customers and employees in the Association's FPNs.

10.2 Subject access requests

Data subjects are permitted to view their personal data held by the Association upon making a request to do so (a "Subject Access Request"). Upon receipt of a Subject Access Request, the Association



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NORTH VIEW Housing Association

12

North View is a registered Scottish charity – charity registration number SC032963

POLICY

DATA PROTECTION

must respond to the Subject Access Request within one month of the date of receipt of the request. The Association:

10.2.1 must provide the data subject with an electronic or hard copy of the personal data requested, unless any exemption to the provision of that data applies in law;

10.2.2 must, where the personal data comprises personal data relating to other data subjects, take reasonable steps to obtain consent from those data subjects to the disclosure of that personal data to the data subject who has made the Subject Access Request; or

10.2.3 where the Association does not hold the personal data sought by the data subject, must confirm that it does not hold any personal data sought to the data subject as soon as practicably possible, and in any event, not later than one month from the date on which the Subject Access Request was made.

10.3 Right to be forgotten

10.3.1 A data subject can exercise their right to be forgotten by submitting a request in writing to the Association seeking that the Association erase the data subject's personal data processed by the Association.

10.3.2 Each request received by the Association will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The



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NORTH VIEW Housing Association

13

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POLICY

DATA PROTECTION

DPO will have responsibility for accepting or refusing the data subject's request, and will respond in writing to the request.

10.4 Right to restrict or object to processing

10.4.1 A data subject may request that the Association restrict its processing of the data subject's personal data or may object to the processing of that data.

10.4.2 Each request received by the Association will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The DPO will have responsibility for accepting or refusing the data subject's request, and will respond in writing to the request.

10.5 Right to have personal data corrected

10.5.1 A data subject may request that the Association correct the data subject's personal data if it is inaccurate or incomplete.

10.5.2 Each request received by the Association will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The DPO will have responsibility for accepting or refusing the data subject's request, and will respond in writing to the request.



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NORTH VIEW Housing Association

14

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POLICY

DATA PROTECTION

11 Privacy Impact Assessments (“PIAs”)

- 11.1 These are a means of assisting the Association in identifying and reducing the risks that our operations have on the personal privacy of data subjects.
- 11.2 The Association shall carry out a PIA before undertaking a project or processing activity, particularly using technology, which poses a “high risk” to an individual’s privacy. High risk can include, but is not limited to, activities using special categories of personal data relating to health or race, or the implementation of a new IT system for storing and accessing personal data or the operation of a CCTV system.
- 11.3 In preparing a PIA, the Association include a description of the processing activity, its purpose, an assessment of the need for the processing, a summary of the risks identified and the measures that it will take to reduce those risks, and details of any security measures that require to be taken to protect the personal data.
- 11.4 The Association will require to consult the ICO in the event that a PIA identifies a high level of risk which cannot be reduced. The DPO will be responsible for such reporting.

12 Archiving, Retention and Destruction of Data

The Association cannot store and retain personal data indefinitely. It must ensure that personal data is only retained for the period necessary. The Association shall ensure that all personal data is archived and destroyed in accordance with its data retention policy. Destruction of data will be carried



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NORTH VIEW Housing Association

15

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POLICY

DATA PROTECTION

out on-site by a paper shredding and confidential waste disposal company. The company will provide the Association with a regular scheduled document shredding service.

13 Documentation and Records

- 13.1 The Association will keep written records of its personal data processing activities, including:
- 13.1.1 its name and contact details, including the contact details of the DPO;
 - 13.1.2 the purposes of processing personal data;
 - 13.1.3 a description of the categories of data subjects and categories of personal data processed by the Association;
 - 13.1.4 categories of recipients of personal data processed by the Association;
 - 13.1.5 where relevant, details of transfers to countries outside the UK, including documentation associated with how the Association protects the personal data after transfer;
 - 13.1.6 how long the Association keeps personal data; and
 - 13.1.7 a description of the technical and organisational security measures that the Association has in place to protect the security of personal data.
- 13.2 As part of the Association's record of personal data activities, the Association documents:
- 13.2.1 information required for its FPNs;
 - 13.2.2 records of consent;
 - 13.2.3 controller-processor contracts;
 - 13.2.4 the location of personal data within the Association's systems;



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NORTH VIEW Housing Association

16

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POLICY

DATA PROTECTION

13.2.5 PIAs; and

13.2.6 records of data security breaches.

13.3 If the Association processes special categories of personal data or criminal records personal data, the Association will keep written records of:

13.3.1 the relevant purpose(s) for which the processing takes place, including (where required) why it is necessary for that purpose;

13.3.2 the legal reason for the Association's processing; and

13.3.3 whether the Association retains and erases the personal data in accordance with its Data Retention Policy and, if not, the reasons for not following the policy.

13.4 The Association will conduct regular audits of the personal data that it processes and update its documentation accordingly, including by:

13.4.1 distributing questionnaires and interviewing staff to obtain a complete picture of personal data processing activities; and

13.4.2 reviewing policies, procedures, contracts and agreements to address areas, such as retention, security and information sharing.

13.5 The Association documents its personal data processing activities in electronic form, so it can add, remove and amend personal data easily.

14 Staff Obligations

14.1 Staff are responsible for keeping their personal data up to date. Staff should let the Association know if the personal data they have provided to the Association changes, for example, if they move to a new house.



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NORTH VIEW Housing Association

17

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POLICY

DATA PROTECTION

- 14.2 Staff may have access to a range of personal data during their employment and staff must help the Association to meet its data protection obligations.
- 14.3 If staff have access to personal data, they must:
- 14.3.1 only access the personal data that they have authority to access, and only for authorised purposes;
 - 14.3.2 only allow other staff to access personal data if they have appropriate authorisation;
 - 14.3.3 only allow third parties to access personal data if they have specific authority to do so from the DPO or their line manager;
 - 14.3.4 ensure that any sharing of personal data complies with the FPN provided to data subjects and the third party with whom it is shared agrees to put appropriate security measures in place to protect the personal data;
 - 14.3.5 keep personal data secure (e.g. by complying with rules on access to premises, computer access, password protection and secure file storage and destruction and other appropriate precautions);
 - 14.3.6 not remove personal data or devices containing personal data (or which can be used to access it), from the Association's premises, unless appropriate security measures are in place (such as encryption or password protection) to secure the personal data and the device; and
 - 14.3.7 not store personal data on local drives or on personal devices that are used for work purposes.



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NORTH VIEW Housing Association

18

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POLICY

DATA PROTECTION

14.4 Staff should contact the DPO if they are concerned or suspect that one of the following has taken place (or is taking place or likely to take place):

14.4.1 processing of personal data without a legal reason;

14.4.2 any data security breach;

14.4.3 access to personal data without the proper authorisation;

14.4.4 personal data not kept or deleted securely;

14.4.5 removal of personal data, or devices containing personal data (or which can be used to access it), from the Association's premises without appropriate security measures being in place;
or

14.4.6 any other breach of this policy.

15 Transfers of Personal Data

The Association may only transfer personal data outside the UK on the basis that that recipient country, territory or organisation is designated as having an adequate level of protection or that the organisation receiving the personal data has provided adequate safeguards so far as data protection is concerned. Further advice must be obtained from the DPO before a transfer is made.

16 Training

The Association will ensure that staff are adequately trained regarding their data protection responsibilities. Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to rights' requests under this policy, will receive additional training to help them understand their duties and how to comply with them.



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NORTH VIEW Housing Association

19

North View is a registered Scottish charity – charity registration number SC032963

POLICY

DATA PROTECTION

17 Consequences of failure to comply

- 17.1 The Association takes compliance with this policy very seriously.
Failure to comply with the Policy:
- 17.1.1 puts at risk the data subjects whose personal data is being processed by the Association;
 - 17.1.2 carries the risk of significant civil and criminal sanctions for the Association; and
 - 17.1.3 may, in some circumstances, amount to a criminal offence by a member of staff.
- 17.2 Due to the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action for a member of staff under the Association's procedures, and this action may result in dismissal for gross misconduct. If an external organisation breaches this policy, they may have their contract terminated by the Association with immediate effect.
- 17.3 Any questions or concerns about this policy should be directed to the DPO.

18 Review

This policy will be regularly monitored and formally reviewed in accordance with the Association's data protection obligations and the Association may amend, update or supplement it from time to time and at least every 3 years or earlier, if required by changes in legislation.



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NORTH VIEW Housing Association

20

North View is a registered Scottish charity – charity registration number SC032963

POLICY

DATA PROTECTION

19 Further information

Further information on data protection matters affecting the Association is available from the DPO.

reviews and amendments

- 19/3/2021 - Section 2a & 2b changed from the General Data Protection Regulation (EU) 2016/679 (“the GDPR”) to the UK General Data Protection Regulation (UK GDPR) to reflect UK leaving the EU.
- 24/8/2022 - Section 12 – Details added on how data is destructed.
- 24/5/2023 - Policy reviewed



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