

1. Scope of Policy

This document presents how Soha Housing Ltd and its subsidiaries will approach and comply with the regulatory framework governing general data protection regulation (UK GDPR). The GDPR applied in the EU from 25 May 2018 and continues to apply to the UK as UK GDPR from 1 January 2021. It replaces all previous Data Protection (DP) laws. Its purpose is to protect the 'rights and freedoms' of living individuals and to ensure that personal data is not processed without their knowledge and is processed with their consent.

This policy applies to current and former individuals known as data subjects under the legislation. The Act does not cover limited companies or other corporate entities. Some public sector authorities are subject to Freedom of Information requests. Housing Associations are currently exempt.

Soha data subjects include:

- Tenants
- Leaseholders and Shared Owners
- Employees
- Applicants for employment, housing and home ownership
- Board members
- Shareholders
- Contractors and Suppliers
- Other stakeholders where Soha has a contractual arrangement or provides a direct service.

2. Aims of Policy

2.1 The aims of this policy are:

- protect the personal data interests of individuals and other key stakeholders using appropriate procedures and controls;
- provide the supporting framework for achieving and maintaining compliance;
- ensure Soha meets applicable statutory, regulatory, contractual and/or professional duties.

2.2 Soha necessarily and routinely uses personal data information when it carries out many aspects of its day to day business. Soha's obligations are covered in this policy with some requirements being imposed on third party organisations if they process or share Soha's data. Any such third party obligations will be subject to contractual arrangements.

2.3 Personal data is all data within Soha computer systems and manual filing systems.

2.4 Soha will adhere to special and criminal categories as outlined within the legislation.

3. Policy Statement

- 3.1 All DP legislation in the UK is regulated by a supervisory authority called the Information Commissioner's Office (ICO). Soha has notified the ICO that it is a Data Controller and processes certain information about data subjects. The ICO notification is retained and renewed annually by the Data Protection Officer (DPO). The ICO will be informed of any changes to Soha's activities.

ICO Registration	Registration Numbers
Soha Housing Ltd	Z5069196
Soha Response Ltd	ZB977060

- 3.2 Soha is committed to ensuring that it complies with data protection principles and the other requirements of UK GDPR:

- ❖ Personal data will be processed lawfully, fairly and transparently.
- ❖ Personal data will only be collected for specified, explicit and legitimate purposes.
- ❖ Personal data will be adequate, relevant and limited to the purpose for which the data is processed.
- ❖ Personal data will be accurate and kept up to date.
- ❖ Personal data will be kept in a form such that the data subject can be identified only if is necessary for the processing purposes. The retention register will be used to enforce this.
- ❖ Personal data will be processed in a manner that ensures the appropriate security. Soha will use industry standard IT tools to secure the data and staff and third party processors will be trained to the appropriate standard.
- ❖ Personal data will not be transferred outside of the EU without adequate protection.

4. Implementation

- 4.1 A UK GDPR Compliance Statement is attached to this policy as appendix 1. Its purpose is to set out the measures Soha employs to ensure routine compliance with UK GDPR.
- **Part 1: Rights of individuals** which addresses what these are and how Soha will administer requests pertaining to a request.
 - **Part 2: Lawful processing** of data in relation to individuals.
 - **Part 3: Disclosure** of information with third parties.
 - **Part 4: Management of personal information** which demonstrates how information is stored, secured and deleted and Soha's approach to data breaches.
 - **Part 5: Surveillance and Audio** which addresses the use of surveillance and recording equipment.
- 4.2 For the purpose of consent, Soha utilises its legitimate interests for the provision of services and maintenance of properties. These interests are contained within contracts. Beyond this, express consent will be obtained should the necessity arise.

5. Resident Involvement

This is an internal policy that deals directly with the way Soha complies with the legislation; therefore, consultation with residents during its production is minimal. However, as with all policies, it will be scrutinised and noted by the Members' Forum. In addition, we may consult on specific service delivery issues.

6. Further details

Data subjects who wish to complain about how their personal data has been processed may:

- a) Use Soha's Complaints Policy;
- b) Complain directly to the DPO;
- c) Complain to the ICO.

Further details can be obtained on the website in the Privacy Notice www.soha.co.uk or from the Information Commissioners Office <https://www.ico.org.uk> or upon request to:

Data Protection Officer
Soha Housing Limited
99 Station Road
Didcot
Oxfordshire, OX11 7NN

Tel No: 01235 515900 / Freephone: 0800 014 1545

Email: dpo@soha.co.uk

7. Monitoring / Responsibility

7.1

Responsibility	Description
Board	The Board has ultimate responsibility for the compliance with the Data Protection Act (UK GDPR).
DPO	Soha is not required to appoint a mandatory DPO. It has opted to do so in order to ensure a robust framework is in place in order to meet its responsibilities. The DPO has designated authority to provide advice and make key decisions in relation to data protection and Soha will ensure the individual(s) is sufficiently resources, trained and supported.
Executive Team	The Chief Executive has overall operational responsibility as the DPO role is assigned within the Governance Team. The Executive Team ensures strategic oversight.
Management	Managers are responsible for compliance with their area of delivery and for ensuring their staff are trained appropriately.
Employees	Employees are responsible for ensure their own information is accurate and for complying with Soha's policies and procedures.

7.2 Current Legislation

Soha will meet its legal obligations under the following legislation:

- Data Protection Act 1998 (DPA), the Data Protection Act 2018 and the General Data Protection Regulation 2018 (GDPR) implemented from 25 May 2018, and replaced in total by the Data Protection Act 2018 (UK GDPR) from 1 January 2021.
- Privacy and Electronic Communications Regulation (PECR)
- Equalities Act 2010.
- Limitations Act 1980.
- Human Rights Act 1998.
- CCTV Code of Practice 2019.
- Computer Misuse Act 1990.

7.3 New regulations and best practice

This policy will be monitored and revised in accordance with new legislation and best practice. The impact to the business will be assessed and special attention will be paid to Soha's:

- (a) Strategies
- (b) Policies and Procedures
- (c) Compliance Regimes
- (d) Information Systems.

7.4 Related Documents

This policy should be administered with the full suite of documents listed in the compliance statement, the statement itself and all operational policies and processes which fall under the areas of lawful processing stated by Soha in its Privacy Notice and/or Fair Processing Notices.

Members' Forum (For information)	14 November 2024	SLT approved (minor update via e-decision)	13 October 2025
		Board Approved	28 November 2024
EIA Completed	4 November 2024	Review Due Date	By October 2026
DPIA Checklist Completed	4 November 2024		