

Data Governance Policy	
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1.0 Introduction

- 1.1 Beyond Housing holds personally identifiable information (PII) about our customers, colleagues, involved residents, suppliers and other key stakeholders, and uses this to carry out our business and deliver our corporate objectives. Appropriate technical and organisational measures will be implemented to ensure that processing is performed in accordance with legal requirements.
- 1.2 This policy applies to all PII data processing by the following data controllers:
- Beyond Housing - ICO registration ZA479140
- 1.3 All colleagues are expected to adhere to this policy and its underlying procedures, any breach would be regarded as misconduct and may lead to disciplinary action under the appropriate disciplinary procedure.

2.0 Policy objectives, key performance indicators (KPI) and reporting

- 2.1 The objective of this policy is to ensure compliance with all relevant data protection and information security legislation and applies to all the processing of PII carried out by Beyond Housing.
- 2.2 This policy describes the company’s approach to data governance and the measures that have been taken to ensure PII is:
- Processed lawfully, fairly and in a transparent manner
 - Collected for specified, explicit and legitimate purposes
 - Adequate, relevant, and limited to what is needed to deliver efficient and effective services
 - Accurate and up to date
 - Kept in a form which allows for Data Subjects to be identified for no longer than is necessary

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- Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, damage or destruction through the use of technical and organisational measures.

2.3 Performance against the below indicators is reported quarterly to the Audit & Risk committee.

Key Performance Indicator	Owner (job role)	Policy objective alignment
Notify the ICO of a reportable data breach within 72 hours	Data governance and policy manager (data protection officer)	Compliance with legislative requirement
Process data subject access requests within 1 month	Data governance and policy manager (data protection officer)	Compliance with legislative requirement

3.0 Definitions

3.1 **Personally identifiable information (PII):** Any data, either in isolation or contained within a record, that could potentially identify an individual, including information which could distinguish or trace their identity. Examples of PII include (but are not limited to):

- Name, address, and other contact details (telephone number, email address)
- Date of birth
- National Insurance number
- Employee or customer number
- Photograph / Video

3.2 **Data controller:** The entity that, either alone or jointly with others, determines the purpose, conditions and means of processing PII.

3.3 **Leaders:** includes the senior leadership team, managers and service team leaders.

3.4 **Colleagues:** includes all permanent and temporary employees, board members, agency workers, contractors, involved customers, volunteers and other persons who have access to PII.

3.5 **Special category data:** PII that may be classed as 'sensitive', for example:

- Financial information (bank account details, benefit eligibility etc.)
- Race or ethnic origin

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- Political opinion
- Sexual orientation
- Religious (or other similar) beliefs
- Trade union membership
- Details relating to an individual’s physical or mental health.

3.6 **Processing:** Any operation performed on PII, including (but not limited to) collection, recording, organising, structuring, storage, adaption, retrieval, consultation, use, disclosure, alignment, or erasure.

3.7 **Data subject:** An identified person, or a person who can be identified (either directly or indirectly) through the application of PII or special category data.

4.0 **Legislative, regulatory, and strategic alignment**

4.1 The Information Commissioners Office (ICO) is the regulator of data protection in the UK.

4.2 Beyond Housing, as a data controller, has a responsibility to comply with all relevant data protection and information security legislation:

- Data Protection Act 2018 (DPA)
- UK General Data Protection Regulation (UK GDPR)
- Privacy and Electronic Communications Regulations (PECR)

5.0 **Responsibilities**

5.1 The Data Protection Officer (DPO) is responsible for setting standards, providing a framework of support, procedures and guidance that meet compliance requirements and to act as a contact point for data subjects and the regulatory authority (ICO).

5.2 All leaders are responsible for ensuring their service areas are compliant with the standards set out in this policy and that data is being processed in line with data governance procedures and guidance.

5.3 All colleagues are responsible for processing data lawfully, in line with this policy and data governance procedures and guidance.

6.0 **Policy delivery**

6.1 Each service area of Beyond Housing will have a Data Champion, this will support delivery of the policy through key activities outlined in the role description.

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6.2 All colleagues will be provided support, training, and access to a suite of supporting procedures and guidance.

6.3 The practical implementation of this policy will be delivered through a suite of underpinning procedures and guidance documents that are available to all colleagues, including as a minimum, but not limited to, the following subject areas:

- Lawful data processing
- Responding to a data breach report
- Processing a data subject access request
- Data storage, retention, and disposal
- Data sharing
- Data confidentiality
- Payment handling
- Use of images - photographs, videos, and CCTV
- Data protection by design and default
- Provision of privacy notices

7.0 Consultation

7.1 The senior leadership team and data protection champions will be consulted upon review of this policy.

8.0 Approval

Approval and revision Criteria	Information
Document written by:	Director of Governance & Business Assurance
Document approved by:	Governance & review committee
Version No.	3

Version no.	Revision date	Reason for revision
3	April 2023	3 year review