

Appropriate Policy Document

1. Introduction

Harbour Homes as a social housing provider, we process Special Category and Criminal Offence data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act (2018) (DPA) and the Data (Use and Access) Act 2025.

We are required to have in place this document, called an 'Appropriate Policy Document', when we rely on certain conditions for processing Special Category and Criminal Offence data. This document will tell you what Special Category and Criminal Offence data we process, where we use it, our lawful bases for processing that data, the purposes for which we process it, and how we ensure compliance with the principles of data protection law.

We will also tell you how long we will hold the Special Category and Criminal Offence data. Some of the information is already held in other documents on the Harbour Homes website, and we have linked to the relevant documents when it is necessary to do so.

2. Description of the data processed

We process the following types of Special Category and Criminal Offence data:

- Personal data revealing racial or ethnic origin.
- Health and disability information
- Trade union membership.

- Criminal offence data (Disclosure Scotland)

Where we need:

- To manage our developments, in particular for the provision of adaptations
 - To manage our placemaking programme
 - To manage tenant participation programmes
 - To manage staff and HR issues
 - To manage our tenancy and housing contracts
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3. Conditions for processing

Below we have listed the lawful basis upon which we are relying, and which need to be covered by this document.

- Employment and social protection of data subjects
 - Explicit consent of data subjects
 - Necessary for the vital interests of data subjects
 - Necessary for the legitimate interests of the organisation
 - For the defence of legal claims
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4. How we comply with the data protection principles in

UK GDPR requires Data Controllers to demonstrate how they comply with the data protection principles provided in it. This section illustrates the measures we have taken to demonstrate accountability for the personal data we process and contains details about how we ensure compliance with the principles of the UK GDPR.

4.1 Accountability

We demonstrate our compliance with the data protection principles through the following measures and documents:



- We have appointed a Data Protection Officer
- Our Record of Processing Activities sets out the personal data categories we process, the purposes, the lawful bases our retention periods for the data, recipients of personal data, any international transfers of data and our means of keeping data secure.
- Our policies and procedures set out how we manage and use data subject information and support their rights under UK GDPR

4.2 Lawful, fair and transparent processing

- Our Privacy Notices explain to individuals how and why their data is processed by Harbour Homes, what their rights are, and how they can get in touch with our DPO and the Information Commission. This includes information about why we process Special Category and Criminal Offence data.
- When we routinely and/or regularly share data with third parties, we enter into written agreements with Data Controllers and Data Processors.

4.3 Purpose limitation

We process Special Category and Criminal Offence only data where it is necessary to do so for specified purposes. We only process Special Category and Criminal Offence where we have a lawful basis to do so under UK GDPR and DPA 2018

We will not process any Special Category and Criminal Offence for purposes which would be incompatible with the purpose for which the data was originally collected.

4.4 Data minimisation

We design our data collection forms and other data collection tools to ensure that we only collect the Special Category or Criminal Offence data necessary to achieve the relevant purpose. Our purposes are set out in our Privacy Notices.



We are satisfied that we collect and retain Special Category and Criminal Offence data only for long enough to fulfil our purposes. We collect enough

but no more than we need in accordance with the data minimisation principle, and we only hold Special Category and Criminal Offence data for the period set out in our retention policies.

Our retention schedule sets out the correct disposal action once records containing special category data are no longer required.

4.5 Accuracy

When we identify data which is inaccurate or out of date, having due regard for the purpose for which the data was processed, we will take necessary steps to rectify or erase it without delay. However, if we cannot erase or rectify it, for example because the lawful basis we rely on to process the data means these rights don't apply, we will document our decision.

Our information is updated from Disclosure Scotland and from the data subject.

In the event of a data subject request for erasure, rectification or restriction of processing their data we will review this and advise the data subject of our decision, in line with our data subjects' right procedure.

4.6 Storage limitation

Special Category and Criminal Offence data processed by us will be retained for the periods set out in our retention schedule. The retention policy for record categories is determined by our legal and regulatory obligations, and our business requirements.

4.7 Security

- We carry out Data Protection Impact Assessments (DPIAs) for uses of personal data that are likely to result in a risk to individuals' data protection rights and freedoms.
- We implement appropriate security measures which are proportionate to the risks associated with the processing.

5. Retention and erasure policies

Our retention period and disposal actions for records containing Special Category Data can be found on our retention schedule.

6. Appropriate Policy review date

This document will be reviewed as a minimum every 2 years, or sooner if there is a change in processing requirements.