

Data Protection

Purpose

- This procedure will apply to ateb Group, West Wales Care & Repair and Mill Bay Homes Limited ("the Group").
- It sets out the Group's expectations of its employees when dealing with sensitive data and should be read in conjunction with the Data Protection Policy.
- Employees must ensure that they comply with this procedure and the Data Protection Policy; a failure to do so may result in disciplinary action being taken.

Data Protection Policy

- The Group's Data Protection Policy sets out the steps the Group will take to ensure it complies with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (collectively referred to as the Data Protection Requirements).
- All employees must ensure that they read and are familiar with the contents of this policy and their responsibilities under it.

Data Breach

- Employees must notify the Data Protection Officer as soon as any data breach has been identified, regardless of the amount of data that has been breached. If employees are in any doubt as to whether a breach has occurred, please seek advice from the Data Protection Officer.

Data Access

- Employees must not access, process or disclose any personal data other than is necessary to carry out the role for which they are employed.

Employee Data

- Notice 1: Employee Privacy Notice and Notice 2: Applicants Privacy Notice sets out the personal and sensitive personal data that we hold on employees, together with the legitimate reasons we have for holding and processing this data.
- The Group may take photographs of employees at charity, corporate and public events and will use these images in corporate documents and for marketing and publicity purposes. This may include recipients outside of the EEA (European Economic Area) e.g. Facebook, website. We will ask you to give your consent to using this data when you join us by asking you to complete the Photo Consent Form (see Appendix 1).
- We may ask you to give your consent to disclose your personal data to third parties at times and/or we may not release information unless we have your consent e.g. responding to mortgage requests/ referring you to our external counsellors. In these circumstances we will ask you complete a Consent Form (See Appendix 2)

Withdrawing Consent

- Individuals who do not want their photographs used by the Group should write to the Governance & Communications Assistant stating that they wish to withdraw their consent for the Group to use their image. The Group will action this request within 28 days of receipt.
- If you have signed a consent form for other purposes as detailed in paragraph 10, you should write to the People Team stating that you wish to withdraw your consent.

Subject Access Requests

- Individuals have a right to gain access to information that is kept about them. This right is known as subject access. Individuals who wish to make a subject access request are required to make a detailed written request to the Governance & Communications Assistant which shall indicate the documentation they are seeking.
- If we hold a large amount of information on you, we may ask you to specify the information your request relates to.
- The Group shall make the information available within one month from receipt of a written request unless the request(s) are complex or numerous in which case this can be extended by a further two months.

- If this is the case, we will inform you within one month of receiving your request, explaining why the extension is necessary.
- In normal circumstances we will not charge you a fee for this request, however if the request is excessive we will charge you a reasonable fee taking into account the administrative burden of providing this information. We may also refuse to respond to your request, in which case we will advise you of our reasons for doing so and inform you of your rights in response to our refusal.
- Some information may enable a third party to be identified. In such instances the Group will balance the subject access request with the expectation of privacy that the third party may have. This would also apply to references received by the Group as part of the recruitment process.

Training and Monitoring

- The Group accepts its responsibility to ensure that managers and individuals receive adequate learning, development, guidance and support to implement this procedure.

Procedure Review and Amendment

- The Group will periodically review the effectiveness of this procedure and make amendments where necessary.

Associated Documents

- The following appendices should be used with this procedure:
 - Appendix 1 – Photo Consent Form
 - Appendix 2 – People Team Consent Form
- The following documents should be read in conjunction with this procedure:
 - Data Protection Policy
 - Computer Usage Procedure
 - Information Security Policy
 - Criminal Records Checking Procedure

Need additional help?

Contact our People &
Communications Team

Appendix 1 – Photo Consent Form



Photo Consent Form

The Group would like to take photographic images of you at charity, corporate and public events. It would like to use these photographic images (until you withdraw your consent) in corporate documents and for marketing and publicity purposes. e.g. Website, Facebook. For further information please refer to the Data Protection Procedure (Employees).

Before using these images we would like your permission. Please complete and sign this form and return to Governance & Communications.

I agree to the ateb group using my photographic image for the purposes set out above, until such time as I withdraw my consent.

Signed	Date
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Appendix 2 – People Team Consent Form



Consent Form

I _____ hereby consent to the ateb group (including Mill Bay Homes and West Wales Care & Repair) disclosing the following information:

To the following individual and/ or organisation(s)

Signed	Date
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