Archie Homes

Data Protection Policy

Published: October 2026



Data Protection Policy

Policy checklist	
Policy owner	Archie Homes
Author	Archie Homes
Version No.	3.0
Date of last review	May 2026
Date of next review	May 2028

Archie Homes will provide this policy, on request at no cost, in large print, in Braille, in audio or other non-written format, and in a variety of languages.

This policies requirements are being revised following the JV with Sixth Street and consultancy support being obtained to ensure Archie Homes fully meet all data protection requirements.

1.0 Introduction

1.1 The purpose of this policy is to outline Archie Homes' responsibilities in relation to the collection, use and disclosure of personal data, and our residents' rights to access and control their personal information.

1.2 Archie Homes' business practices will comply with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and any related or subsequent data protection legislation and guidance.

1.3 As part of its work, Archie Homes is required to collect and use certain types of information about individuals who come into contact with the organisation. This personal data must be handled properly, however it is collected, recorded and used, whether on paper, electronically or through any other recording medium.

1.4 Archie Homes is committed to handling all personal data sensitively, appropriately and lawfully, fully adhering to and complying with the principles and requirements of UK GDPR and the Data Protection Act 2018.

1.5 Archie Homes is registered with the Information Commissioner's Office (ICO) as required under applicable data protection legislation. Archie Homes is the Data Controller. Operational responsibility for data protection compliance is delegated to the designated Data Protection Lead.

1.6 The aim of Archie Homes' Data Protection Policy is to outline our responsibilities regarding the collection, use and disclosure of personal data, our customers' rights in relation to their information, and Archie Homes' arrangements for complying with data protection legislation.

2.0 Scope

2.1 This policy applies to all personal data collected, owned, processed and used by Archie Homes throughout its business activities. All employees, board members, contractors, consultants, sub-contractors, managing agents and any other persons working on behalf of Archie Homes are expected to comply with this policy.

3.0 Definitions

3.1 **Data**
Data includes electronic data, manual records and any other accessible records containing personal information held by the organisation.

3.2 **Data Subject**
A data subject is an identified or identifiable living individual whose personal data is processed by Archie Homes.

3.3 **Data Controller**
A Data Controller is the organisation that determines the purposes and means of processing personal data. Archie Homes acts as the Data Controller for the personal information it processes.

3.4 **Personal Data**
Personal data means any information relating to an identified or identifiable living individual. This may include information relating to protected characteristics under the Equality Act 2010.

3.5 Archie Homes takes data protection seriously. All reported or suspected data breaches will be investigated and, where substantiated, appropriate action will be taken to remedy the situation and minimise risk.

3.6 The Board will lead by example in demonstrating good governance and ensuring compliance with legal requirements, rules and procedures.

3.7 In carrying out its duties and responsibilities, Archie Homes will comply with the principles of UK GDPR and ensure that personal data is:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- retained only for as long as necessary;
- processed securely using appropriate technical and organisational measures;
- processed in accordance with the rights of data subjects;
- managed in a way that demonstrates accountability and compliance with data protection legislation;
- only transferred outside the UK where appropriate safeguards and lawful transfer mechanisms are in place;

- only shared through authorised and secure channels.

4.0 Responsibilities

4.1 Archie Homes will:

- Meet its legal obligations by clearly specifying the purposes for which personal information is used.
- Collect and process personal information only where necessary to meet operational, contractual or legal requirements.
- Ensure that the rights of individuals under UK GDPR can be fully exercised, including:
  - the right to be informed;
  - the right of access;
  - the right to rectification;
  - the right to erasure;
  - the right to restrict processing;
  - the right to data portability;
  - the right to object;
  - rights relating to automated decision-making and profiling.
- Implement appropriate technical and organisational measures to safeguard personal information.
- Treat all individuals fairly and without discrimination when handling personal information requests.
- Maintain procedures for responding to lost, corrupted, compromised or unlawfully disclosed data.
- Ensure all persons processing personal data on behalf of Archie Homes understand their responsibilities regarding confidentiality and data protection compliance.
- Regularly review and audit the way personal information is collected, stored, managed and used.
- Allow individuals to request correction, restriction or deletion of personal data where appropriate and lawful.
- Ensure all employees, board members and persons working on behalf of Archie Homes understand that breaches of this policy may result in disciplinary or contractual action.
- Ensure appropriate technical and organisational security measures are implemented, including encryption where appropriate.

5.0 Monitoring and Performance

5.1 The Board is responsible for ensuring this policy is regularly reviewed and updated to reflect legislative, regulatory and operational changes relating to data protection.

5.2 All persons working on behalf of Archie Homes must comply with this policy. Where individuals have access to personal data, they must receive appropriate information, instruction and awareness regarding their responsibilities under data protection legislation.

5.3 Appropriate action will be taken in response to actual or suspected breaches of this policy. Reportable personal data breaches will be notified to the Information Commissioner's Office within statutory timescales where required. Affected individuals will also be informed where legally required.

6.0 Background Documents

6.1 This policy should be read in conjunction with the following legislation and related guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Equality Act 2010
- Privacy and Electronic Communications Regulations (PECR), where applicable
- Relevant guidance issued by the Information Commissioner's Office (ICO)