



Dunbartonshire and Argyll & Bute  
Valuation Joint Board

## **Dunbartonshire and Argyll & Bute Valuation Joint Board**

### **Policy statement and additional safeguards on processing special category data and personal data relating to criminal convictions and offences.**

#### **Introduction**

Data Protection law requires controllers who process special category personal data, or personal data relating to criminal convictions and offences to have an appropriate policy document in place setting out a number of additional safeguards for this data.

This policy must:

(a) explain the controller's procedures for securing compliance with the principles in Article 5 of the GDPR (principles relating to processing of personal data) in connection with the processing of personal data in reliance on the condition in question, and

(b) explain the controller's policies as regards the retention and erasure of personal data processed in reliance on the condition, giving an indication of how long such personal data is likely to be retained."

This document is the policy adopted by Dunbartonshire and Argyll & Bute Valuation Joint Board (VJB) in relation to this processing.

#### **Policy Statement**

##### **1: Lawfulness, fairness and transparency:**

All data flows into and out of the Valuation Joint Board have been assessed to determine the legal basis under which that data is processed and the results of the assessment are documented. The VJB is satisfied that it has a legal basis for holding the personal data that it holds, and that it also has a valid legal basis for disclosing this personal data to third parties where this happens. A copy of the VJB privacy notice is available at [www.saa.gov.uk/dab-vjb/privacy-notices](http://www.saa.gov.uk/dab-vjb/privacy-notices) The VJB is presently updating its data processor agreements and data sharing agreements to reflect the new legal requirements.

##### **2: Purpose limitation:**

The purposes for which data are collected are clearly set out in the privacy notice. This includes reference to further use of data for internal management information purposes.

### 3: Data minimisation:

In assessing the data flows, the VJB has also taken the opportunity to critically assess the need for each of the data fields in question and where superfluous data was being captured, the VJB has now stopped capturing this.

### 4: Accuracy:

Data is checked for accuracy and, where any inaccuracies are discovered, these are promptly corrected and where appropriate any third party recipients of the inaccurate data notified of the correction.

### 5: Storage limitation:

The VJB only keeps personal information for the minimum period of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on business need. The VJB maintains a records retention and disposal schedule which sets out how long it holds different types of information for. You can view this at [www.saa.gov.uk/dab-vjb/public-records-act](http://www.saa.gov.uk/dab-vjb/public-records-act)

Ongoing management of the VJB's records and information is subject to the provisions of a Records Management Plan, which was developed in terms of the Public Records (Scotland) Act 2011 and approved by the Keeper of the Records of Scotland. It is available online at [www.saa.gov.uk/dab-vjb/public-records-act](http://www.saa.gov.uk/dab-vjb/public-records-act). The Records Management Plan sets out, in much greater detail, the provisions under which the VJB complies with its obligations under public records legislation, data protection and information security and is complementary to this policy statement.

### 6: Integrity and confidentiality:

The VJB has an approved Information Security Policy which sets out roles and responsibilities within the organisation in relation to information security. All staff are required to take information security training and this is refreshed annually. ICT systems have appropriate protective measures in place incorporating defence in depth and the systems are subject to external assessment and validation. The VJB has policies and procedures in place to reduce the information security risks arising from use of hard copy documentation.