Information Rights Policy

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Approval Level	Executive
Resident Input	N/A
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1. What this policy is for

1.1 Southway Wythenshawe Homes is a community-based landlord. We handle large amounts of personal data about colleagues, customers, community members and partners. We also hold and publish information about how we run our business and manage our customers' homes.

1.2 This policy explains how we support individuals to use their rights under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Social Tenant Access to Information Requirements (STAIRs) policy statement. It applies to all information rights requests received by Southway Wythenshawe Homes.

2. Who this policy applies to

Customers	Customers whose personal data is processed by Southway Wythenshawe Homes
Colleagues	Colleagues whose personal data is processed by Southway Wythenshawe Homes
Third Parties and Contractors	Third Parties and Contractors whose personal data is processed by Southway Wythenshawe Homes
Members of the public	Members of the public whose personal data is processed by Southway Wythenshawe Homes

2.1 The UK GDPR, DPA 18 and STAIRs provide individuals with information rights. Southway Wythenshawe Homes is legally obligated to enable any relevant parties to exercise their information rights. Our approach to this is set out below.

3. Regulation and Legal Requirements

3.1 This policy supports compliance with the following regulations and legal requirements

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Social Tenant Access to Information Requirements (STAIRs)

4. What we will do

Individual Rights

4.1 Under information laws, individuals have the following rights:

- **Right to be Informed** –to receive clear information about how we use their personal data.
- **Right of Access** – to see the personal data we hold about them or the management of their home.
- **Right to Rectification** – to have inaccurate or incomplete data corrected.
- **Right to Erasure** – to ask us to delete their personal data in certain circumstances.
- **Right to Restrict Processing** – to limit the way their data is used in certain circumstances.
- **Right to Object** – to object to how we process their data, including for direct marketing or profiling.
- **Right to Data Portability** – to receive their data in a readable format and move it to another organisation, where appropriate.
- **Rights related to Automated Decision Making and Profiling** – to not be subject to decisions made only by automated systems in certain situations

4.2 A requester can make a request in any written or verbal format. They do not need to mention the law or complete a specific form. Colleagues must be able to identify an information rights request and contact Information Governance for support.

4.3 Once we have confirmed the identity of the requestor we must comply with a request within one month. In some specific circumstances, for instance if the request is complex, involves speaking with our partners or is made alongside other rights requests (see section 3), we may extend our response time by a further two months.

4.4 If the request has been repeated within a short time frame, it relates to information which has already been made available, or responding would put an unreasonable burden on our resources, we may consider it to be excessive. In these cases, we will explain our reasons for refusing the request in part or in full. We may also decide to refuse a request which is repeated by several applicants, is clearly malicious or made in an abusive manner.

4.5 We will provide the information in a format which is easy to access and use. We will usually use the same method to share the information as the one that was used to make the request (for example, by secure email), unless the requester specifies a different way they wish to receive it.

4.6 Where appropriate, our response to a request will include:

- A summary of the request
- Whether Southway Wythenshawe Homes is accepting or refusing the request
- Reasons for any exemptions, redactions, or refusals
- Any information we are providing as part of the request
- How to complain to the Data Protection Officer (DPO) and Information Commissioner
- Any other information required under UK GDPR.

4.7 Records relating to information rights requests, including any decisions to refuse all or part of a request, will be kept for in line with the outlined retention period.

Exercising individual rights to access personal data

4.8 The right of access, which we refer to here as ‘subject access’, is a fundamental right which gives people the right to obtain a copy of their personal information, as well as other useful information.

4.9 The Data Protection Officer, or a Deputy DPO in their absence, will log the request and work with the business to take reasonable steps to locate, review, and share the relevant personal data, following the Subject Access Request Procedure or other relevant procedures if held.

4.10 Sometimes, a requester may not be entitled to receive all the information they ask for. For example, if it contains confidential legal communications, or if it contains a reference about a person. If the information includes personal data about another person, we must protect their identity. We apply a common sense approach:

- If the requester has already seen the information or already knows who the other person is, we may leave it in.
- If they have not, we will redact the details to protect the other person’s privacy.

Exercising a customer’s right to access housing management information

4.11 This Under the Social Tenant Access to Information Requirements, from April 2027, customers or someone who they have asked to represent them, can request information related to the management of a registered provider’s social housing.

4.12 The Data Protection Officer, or a Deputy DPO in their absence, will log the request and work with the business to take reasonable steps to locate, review, and share the relevant housing management information, following the Social Tenants Access to Information Requirements Procedure or other relevant procedures if held.

4.13 Sometimes, a requester may not be entitled to receive all the information they ask for and requests may be refused. For example, if the work involved with responding to the information request would take us more than 18 hours, or if there is a more appropriate scheme that can be used to request the information.

Exercising individuals right to be informed about how personal data are used

4.14 This Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the UK GDPR.

4.15 Each respective privacy notice is available from their internet homepage which is the main way we provide this information.

4.16 You can find your appropriate Privacy Notice at the bottom of Southway Wythenshawe Homes' website. The Data Protection Officer, or a Deputy DPO in their absence, will update the main privacy notice regularly and work with teams collecting personal data to create 'privacy statements' at the point of collection. We will always provide our privacy information in clear and plain language.

4.17 The privacy notice page provides an overview of the ways we use a customer's information at different stages of their relationship with us (which we refer to as their 'personal data journey'), and who we may share it with. This page also sets out their rights over this information and how to exercise these rights, get advice or make a complaint.

4.18 For each stage of the personal data journey we provide details of our purposes for processing their personal data, our 'lawful basis' (legal reason) we rely on to process personal data for this purpose, and the 'retention period' for that personal data (how long we will hold the information). Customers can also read a summary version of this notice.

Exercising other individuals' rights over information:

Right to correct inaccurate to incomplete personal data

4.19 Customers can ask us to update or correct personal information if it is inaccurate or incomplete. Southway Wythenshawe Homes will review requests on a case-by-case basis and make necessary corrections. Where appropriate, we will also inform any third parties we have shared the data with so they can update their records.

Right to the deletion of personal data

4.20 In certain circumstances, individuals can ask us to delete the personal data we hold about them. Southway Wythenshawe Homes will review requests on a case-by-case basis and delete the data where appropriate. If we cannot delete data for legal or operational reasons, we will explain this to the customer.

Right to object to the processing of personal data

4.21 Individuals can object to how we process their personal data, including objections to direct marketing and certain types of profiling or activity carried out under 'legitimate interests'. We will stop using the personal for these purposes unless we can show that our interests override the individual's information rights and freedoms.

4.22 Objections to direct marketing will always be upheld, and we will stop sending marketing communications immediately.

Rights relating to automated decision-making and profiling

4.23 We will explain where automated decision-making applies and how decisions are made. This right applies to any Artificial Intelligence tools or other uses of algorithms to predict behavior or to control access to a service.

4.24 Where a relevant process is automated, we will tell anyone who could be affected by the decision, offer a meaningful human review and reconsider the decision if requested.

Right to request data in a portable format

4.25 Where applicable, we will provide the data in relation to this right securely in a suitable digital format. If technically possible and requested, we may also transfer the data directly to another organisation on the customer's behalf.

Internal reviews and complaints

4.26 Requesters may complain about how we have handled any information rights request. They may also ask for an internal review of how a request was managed.

4.27 The Data Protection Officer handles internal reviews and complaints about information rights requests. This may be delegated to trained colleagues. We must acknowledge all complaints within 30 days, in line with recent changes to information laws, and respond without undue delay.

4.28 This process is separate from Southway Wythenshawe Homes's respective main complaints processes and has different timescales. However, we aim to respond to information rights complaints within ten working days where possible.

4.29 The Data Protection Officer's details can be found through Southway Wythenshawe Homes' established support or communication channels.

4.30 If a requester remains unhappy after our response and internal review, they can complain to the relevant body who oversees their request scheme.

4.31 If the request was made under the UK GDPR, we will provide the Information Commissioner's contact details when responding to an information rights request and again after the internal review response:

- **Information Commissioner's Office (ICO)**
  Phone: 0303 123 1113
  Website: ico.org.uk/make-a-complaint/

4.32 If the request was made under STAIRs, we will provide the Housing Ombudsman's contact details when responding to an information rights request and again after the internal review response:

- **Housing Ombudsman Service (HOS)**
  Phone: 0300 111 3000
  Website: www.housing-ombudsman.org.uk/contact-us/

5. Equality, Diversity and Inclusion

5.1 An Equality Impact Assessment (EIA) was completed February 2026. The actions from this are:

Action	Policy Change
None identified	N/A

6. Who is responsible

6.1 The people responsible for overseeing this policy are listed below

Officer	Responsibility
Executive Director – Transformation & Technology	Executive owner of the policy. Provides strategic oversight and ensures adequate resources are available to meet information rights obligations.
Director of ICT, Data & Digital	Accountable for implementing the policy within their service area and ensuring managers and colleagues comply with requirements.
Information Governance	Provides advice, guidance and oversight on information rights matters, monitors compliance, manages requests and complaints, and reports on performance and risks

Manager / Data Protection Officer	
All Colleagues	Must comply with this policy and related procedures, complete mandatory training, cooperate with information rights requests, and manage information appropriately.

7. Monitoring and Reporting

7.1 The Information Rights Policy will be reviewed every three years.

7.2 The next review date for this policy is shown on the cover sheet.

8. Glossary

Word	Definition
Information Rights Request	When someone asks to use their legal rights over personal data or housing management information held by an organisation.
Data Protection Act 2018 / UK General Data Protection Regulation	Two UK laws that work together to make sure we use people's information lawfully and fairly. They protect their information rights.
Data Protection Officer / Deputy Data Protection Officer	Colleagues responsible for making sure we handle personal data legally and safely. Queries and concerns can be raised through Southway Wythenshawe Homes' established support or communication channels.
Requester	An individual making a request to use any of their rights over information about them, or the management of their home.
Personal data	Any information that can identify a person, either directly or indirectly. This can include names, ID numbers, location data, online identifiers, or other factors linked to someone's identity.

Housing management information	Any information related to the management of a registered provider's social housing. This can include details of policies, plans and actions carried out in the management of social housing, and information captured and retained to support these activities.
Internal review	A review of how an Information Rights Request has been handled.
Social Tenant Access to Information Requirements (STAIRs)	A scheme which enables social housing customers to ask their landlord for information about how their home and housing services are managed.