



## **A1 HOUSING BASSETLAW DATA PROTECTION POLICY**

20 June 2008	Data Protection Policy	Approved By
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## **1. INTRODUCTION**

- 1.1. A1 Housing Bassetlaw Ltd recognises the importance of ensuring the correct and lawful collection and use of personal and confidential data about its employees, Board and Board Members, employment applicants, residents, housing applicants and suppliers in accordance with the Data Protection Act 1998, and the Freedom of Information Act 2000.

In outlining this policy A1 Housing Bassetlaw Ltd is aware at all times of the following 8 principles of good practice in respect of confidentiality and data protection: -

- The information to be contained in personal data shall be obtained, and personal data shall be processed, fairly and lawfully
- Personal data shall be held only for one or more specified and lawful purposes
- Personal data held for any purpose or purposes shall be adequate, relevant and not excessive in relation to that purpose or those purposes
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data held for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- Personal data will be processed in accordance with data subject's rights
- Appropriate security measures shall be taken against unauthorised access to, or alteration, disclosure or destruction of, personal data and against accidental loss or destruction of personal data
- Personal data will not be transferred overseas without adequate protection

## **2. PURPOSE**

- 2.1. The purpose of this policy is to set out the way in which employees and any employed contractors must deal with confidential information in the course of their work with A1 Housing Bassetlaw Ltd.

## **3. SCOPE**

- 3.1. This policy applies to all Board members and staff of A1 Housing Bassetlaw Ltd. A breach of confidentiality is a serious offence and failure

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to comply with this policy will result in disciplinary action under the A1 Housing Bassetlaw Ltd disciplinary procedure.

#### **4. RESPONSIBILITIES**

- 4.1. It is the responsibility of all staff and Board Members to maintain confidentiality as set out in this policy.
- 4.2. It is the responsibility of all staff to inform a senior manager when they are made aware of a breach of confidentiality. The senior manager is responsible for taking appropriate action when made aware of a breach of confidentiality.
- 4.3. The Managing Director, as Data Controller for A1 Housing Bassetlaw Ltd, is responsible for ensuring that Board, Area Boards and Sub-Committee Members comply with the policy
- 4.4. All staff are responsible for data, which is taken off site. All data contained on portable devices must be kept secure through use of passwords and regularly swept for viruses.
- 4.5. Officers working from home must provide their line manager with details of data to be used and what levels of protection are required.
- 4.6. Data transferred via 3<sup>rd</sup> parties (i.e. couriers) must be password protected and sent by the appropriate levels of security according to the type of data transported

#### **5. POLICY**

##### **5.1. General**

5.1.1. A1 Housing Bassetlaw Ltd considers all information given by its customers, officers and contractors as confidential, and any unauthorised disclosure of any such information is treated very seriously.

5.1.2. A1 Housing Bassetlaw Ltd will seek to ensure that:-

- all of its systems and procedures are secure
- confidentiality is addressed through training of Board Members and staff
- all obsolete information will be destroyed or disposed of through secure mechanisms i.e. shredding or certificated disposal of paper records
- wherever possible it will build into its processes regular reviews to ensure that any information, particularly regarding tenants and leaseholders, is accurate and maintained. However, it is the responsibility of the individual concerned to

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keep A1 Housing Bassetlaw Ltd informed of any changes, such as to tenancy details.

- it will correct any information found to be incorrect.

## 5.2. DATA PROTECTION

5.2.1. This policy includes the changes introduced by the Data Protection Act 1998, which now includes data held on structured manual files in addition to data held on computer records.

5.2.2. A1 Housing Bassetlaw Ltd will maintain and review the registration under the Data Protection Act on a regular basis, and is committed to protecting Data in accordance with the Data Protection Act 1998 and in accordance with this policy.

5.2.3. A1 Housing's IT Manager will be responsible for compliance, and to advise on any Data Protection issues.

5.2.4. A1 Housing Bassetlaw Ltd will comply with the principles contained in the Data Protection Act which are that personal data shall be:-

- obtained and processed fairly and lawfully
- held for one or more specified lawful purposes and personal data held for a purpose shall not be disclosed in any manner incompatible with that purpose
- adequate, relevant and not excessive to the purpose held
- accurate and kept up-to-date
- kept for no longer than required for a specified purpose

and that

- an individual is entitled to be informed by a data user of information held, to be supplied with a copy of such information and have any inaccuracies corrected
- appropriate security measures must be taken against unauthorised access to, alteration, disclosure or destruction of personal data and against accidental loss
- the transfer of personal data to countries outside the European Union which do not provide an adequate level of protection for personal data is prohibited.

5.2.5. A1 Housing Bassetlaw Ltd will allow individuals to access their personal records in accordance with the Data Protection Act. Access to such information is restricted to information given to A1 Housing by that individual.

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5.2.6. Tenants and applicants to the Housing Register can request a copy of the information in order to check the accuracy and to seek amendments or erasure where information is inaccurate. A1 Housing will request some form of identity before allowing access to records under this procedure.

### **5.3. PUBLICATION SCHEME**

5.3.1. In implementing the Freedom of Information Act 2000, A1 Housing Bassetlaw Ltd intends to promote an understanding of the work undertaken within the organisation aiming to foster a spirit of trust and openness with the public and other organisations. This will be achieved by: -

- Promoting transparency in the way we make our decisions, by providing clear information about our policies and processes through our publication scheme.
- Dealing with individual requests for information courteously and promptly, within the timescales set out by the Act and providing advice and assistance if necessary.

5.3.2. The Freedom of Information Act 2000 states that any person making a request to A1 Housing Bassetlaw Ltd for information must be informed whether the organisation holds the information (as outlined within the classes of information) and subject to the exemptions listed in the Act supplied with that information.

5.3.3. A publication scheme is a guide to the “classes” of information that A1 Housing Bassetlaw Ltd, intends to routinely make available. Information can be made available in many forms and is not limited to information produced on paper. Therefore, information made available via the organisations web site will be as much a part of the scheme as printed documents.

### **6. MONITORING AND REVIEW**

6.1 The Policy will be monitored regularly and will be reviewed annually by reporting to the Board.

6.2 The performance of the policy will be subject to periodic consultation with tenants.

6.3 See also the linked policy on Access to Information.

### **7. FEEDBACK**

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7.1 We welcome suggestions and complaints from people who use or provide our services. We believe that this can provide some important lessons to help us ensure that the service is improved for everyone.

If you have something to say about A1 Housing's policies and procedures or the information that is provided about them, then please let us know. Please refer any comments to the author of this document as shown below.