



ORE VALLEY GROUP

DATA PROTECTION & INFORMATION SECURITY POLICY

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ORE VALLEY GROUP DATA PROTECTION & INFORMATION SECURITY POLICY

INTRODUCTION

Ore Valley Housing Association is the parent company of the Ore Valley Group, which has 3 subsidiary companies, namely Ore Valley Enterprises, Ore Valley Community Initiatives and Cardenden Heat and Power (CHAP).

The purpose of this policy is to ensure that:

- All personal data held by the Ore Valley Group will be processed lawfully and will only be used for the purposes for which it was collated.
- Only authorised personnel will have access to information. Staff will only have access to information they require for the purposes of carrying out the duties of their post.
- The Ore Valley Group has systems in place to recover data should it be accidentally lost, damaged, or destroyed.

In addition, the document is designed to ensure that only those members of staff who are required to input and make amendments to data will be able to do so.

REFERENCES

Reference should be made to the Data Protection Act 1998 and the Freedom of Information (Scotland) Act 2002. Further details can also be obtained by visiting the Scottish Information Commissioner website at www.itspublicknowledge.info/legislation.htm

DATA COLLECTION AND PROCESSING

The Ore Valley Group will initiate procedures to ensure adherence to the following principles of legislation.

- All personal data will be processed fairly and lawfully;
- Personal data will only be used for the purpose for which it was Collected;
- The personal data held on record will be adequate, relevant and not excessive in relation to the purposes for which they are processed;
- Personal data shall be accurate and, where necessary, kept up to date;
- Personal data will not be kept for longer than is necessary for the purpose for which it was collected;
- Personal data will be processed in accordance with the rights of the data subjects under the legislation;
- Right of access to personal data held on them;
- Right to stop or prevent processing likely to cause unwarranted substantial damage or distress;
- Right to compensation;
- Right to obtain rectification, blocking, erasure or destruction of inaccurate data;

- Right to request the Data Protection Commissioner to assess whether personal data is being processed lawfully;
- Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against loss or destruction of, or damage to, personal data.

ACCESS TO PERSONAL INFORMATION

All staff and any other person whose personal data, (personal information about a living individual who can be identified from that information and other information which is in, or likely to come into, the data controller's possession), the Ore Valley Group processes (processing means obtaining, recording or holding the data or carrying out any operation or set of operations on data) have the right to:

- Be informed what personal data about them the Group holds and what it is used for;
- Access this personal data;
- Update the personal data the Group holds;
- Be informed how the Group is complying with its obligations under the Data Protection Act (DPA);
- Complain to the SCSO if they feel that the Data Protection Policy has not been followed.

ACCESS TO INFORMATION

The Association has procedures in place outlining which members of staff have access to process data, to read data and those members who have no access to data.

Appended to this document is information outlining the access to data afforded to each member of staff, at no time should this access be altered without the prior approval of the CEO.

STORAGE OF DATA

- Confidential information relating to prospective, current and former tenants, contractors and suppliers is held on the housing database, the main file server, the e-mail system and manual files.
- Confidential information will only be accessible to staff who 'need to know' such information in order to carry out their duties.
- Confidential information will be kept discreetly at all times, out of view of visitors to the office or other staff and contractors who do not need access to the information in order to carry out their duties.
- Files will be suitably stored and will not be removed from the office unless absolutely necessary. If files are removed from the office then they will remain in the control of that member of staff, kept secure and not visible to other persons.
- Members of staff, applicants for housing, tenants, leaseholders and any other visitors will be offered a private place to discuss matters of a confidential nature.
- Where there is a requirement to discuss confidential information

internally, this will be done in private and only between members of staff who have a legitimate right to access that information in order to carry out their duties

- At the end of the working day, all confidential information will be moved out of view and wherever possible put away in desks and filing cabinets.
- When dealing with customers by telephone the staff will take steps to ensure the identity of the individual before disclosing personal information.
- Employees will not discuss confidential information with third parties who have no particular right to know about the internal business of the Ore Valley Group.
- The Association and its subsidiaries will give anonymity to customers and tenants wherever practicable in reports to its Boards.
- Confidential information relating to all prospective, current and former employees and Board is held securely by the CEO and SCSO.

GENERAL SECURITY

The following procedures are to be used by all staff.

- All staff with access to computer data will be required to change their passwords on a regular basis. On no account should passwords be divulged to other members of staff.
- When leaving their workstations, staff will ensure that they either log off or lock their PC.
- Procedures are in place to ensure that staff have access to all data they require to enable them to carry out their duties of their post. At no time should staff be using a PC which has been accessed by another member of staff.

INCIDENT REPORTING

There is a formal procedure for reporting, investigating and recording Information security incidents. All incidents should be reported to the Business Development Manager who will investigate immediately.

Access

It is the Ore Valley Group's intent as far as possible to provide basic, network-connected communication tools for the use of staff and Board members. It is also Ore Valley HA's intent to provide a communications link between its own e-mail system and the mail systems that operate on the national and international data networks.

Occasional and incidental social communications using any communication tools are not disallowed by this policy and are permitted so long as this does not interfere with employee performance of their expected duties.

Social Media Platforms

The Ore Valley Group respects the right to a private life and that includes

joining any social media platforms employees wish. However, information posted on such sites is classed as public and not private. Employees and governing body members are therefore not allowed to disclose confidential information relating to the Ore Valley Group, its customers, partners, suppliers, board members, employees, or stakeholders on any social networking platforms. It is also prohibited to post any comments on people and events connected to the Ore Valley Group, or make any remarks which could potentially bring the Ore Valley Group into disrepute. Any such actions could result in disciplinary action, including dismissal.

If using social media platforms employees are expected to adhere to the following;

- keep profiles set to private and protect tweets.
- ensure all passwords are kept private.
- we do not prohibit employees from listing Ore Valley as their employer however we do advise against it.
- employees should be aware of the language and content of their posts – in particular where employees have an association with their employer e.g. listing their employer or linked with colleagues.

Policy Breaches

As mentioned earlier, the Ore Valley Group provides tools to support its communication, learning and service activities and associated administrative functions. Any use of these facilities that interferes with the Group's activities and functions or does not respect the image and reputation of the Ore Valley Group will be regarded as breaching this policy.

EMAIL

All members of staff will have access to Email facilities. The CEO and SCSO may undertake periodic audits of email with assistance from the Association's IT support provider. This may involve checking an individual employee's email via access using the Google Admin console. All staff are aware that any form of e-mail or other electronic information gained through periodic checks or accessed by the Ore Valley Group to corroborate instances of suspected fraud, bribery, whistle blowing or other breach of terms and conditions will be used by the Ore Valley Group for the purposes of disciplinary action.

It is a disciplinary offence to use Email for the purposes of sending rude or offensive messages. *(Please refer to the Groups Communication Tools Policy for further details)*

SHARING OF INFORMATION

The Ore Valley Group has developed a Communications Strategy for sharing information with other organisations such as the Local Authority, Police etc.

DATA RECOVERY

The Ore Valley Group has systems in place to ensure that data can be easily recovered in the event of accidental loss or damage.

Back-ups are taken on a daily basis and stored locally and off-site. Back up systems utilise automated cloud-based off-site storage. Files are protected via the use of cloud services from Google and Amazon.

PERFORMANCE MEASURES AND TARGETS

- Complaints that are received with regard to Data Protection and any associated compensation payments will be monitored.
- Results of the monitoring exercises will be reported to the Audit And Risk Management Committee on an annual basis. In the event of serious breaches, these will reported at the next scheduled meeting.

DATA PROTECTION REGISTRATION

Ore Valley Housing Association is registered with the Data Protection Act 1998 – **Registration No: Z5454706, Security No: 10213946**. This registration is renewed on an annual basis through the Information Commissioner. Copies of the Association's Registration can be found within the main filing system on file 10.8

MONITORING AND REVIEW

The effectiveness of this policy will be reviewed on a three yearly frequency unless legislation, regulation, or monitoring exercises dictate otherwise.

APPENDIX 1

Access to Information

Drive Directory

- All staff have access to the General Directory Drive of the server .
- All staff have access to the Development Directory of the server.
- All staff have access to the Corporate Support Directory of the server.
- All staff have access to the Housing Management Directory of the server.
- All staff have access to the Finance Directory of the server
- All staff have access to the Maintenance Directory of the server
- The CEO and Senior Corporate Support Officer have access to the Personnel Directory
 - o Maryjane Elder, Corporate Support Officer has access into the Salaries, Pensions and staff details files only within the Personnel Directory.
 - o Sections of the Drive that are restricted as outlined above are not visible or accessible to staff who should not have access.

APPENDIX 2

Awareness Guidance

Data Protection Act 1998 (DPA)

The Data Protection Act 1998 (DPA) enables individual access to information to which they are the subject e.g. someone's own education/medical records, credit reference file etc. The DPA is not restricted to information held by/on behalf of public authorities or those bodies carry out a public function nor is its purpose limited to the right of access to information. For further information, refer to <http://www.ico.gov.uk/>

The Data Protection Act applies to England, Ireland, Scotland, and Wales.

There is two other accesses to information regimes, which the Scottish Information Commissioners Office has responsibility for:

- Freedom of Information (Scotland) Act 2002
- Environmental Information (Scotland) Regulations

Freedom of Information (Scotland) Act 2002

The Freedom of Information (Scotland) Act 2002 enables any person to obtain information from Scottish public authorities. This is a legal right and will ensure that all people get information to which they are entitled.

This legal right of access includes all types of recorded information of any date held by Scottish public authorities. From 1 January 2005, any person who makes a request for information must be provided within it, subject to certain conditions.

Information highlighting the legislation can be found on www.itspublicknowledge.info/legislation

Environmental Information (Scotland) Regulations

The Environmental Information (Scotland) Regulations enable people access to environmental information.