

Data Protection Policy for WAM

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What data should we keep?

In order to administer tenancies, we need to keep names, addresses, emails, telephone numbers, records of payment and any correspondence relevant to the tenancy. That does not include any bank details. These records must be kept for one year after the tenancy ends to allow for the terms set out by Companies House for a firm limited by guarantee (WAM Ltd) but they must also be available to Worthing Borough Council for six years to conform with our Service Level Agreement.

Where and how should we keep it?

Whenever possible, records should be stored electronically, using Google Drive. Paper records transferred by WBC at the time WAM took over, or used by tenants without access to emails, should be kept in box files in a locked drawer in the house of the relevant WAM representative.

Who should have access to it?

A WAM representative, usually a member of the WAM Exec, may be given access to whichever part of the data is relevant to their role. For example, an overseer can read the names and addresses of tenants on their site. Access should continue only so far as they are appointed to that role and ended immediately if they leave.

Some members of the Exec, in order to carry out their functions, will require access to the whole data set, along with editing rights to amend it. They will also need to add or subtract others who have read only rights. The number of people with such access should be kept to a minimum but be sufficient to allow for emergencies (e.g. data faults or queries when a member is ill or absent on leave).

Officials of Worthing Borough Council have a duty to audit the data and will require access to it for that purpose.

How should we secure and update it?

Google Drive has an automatic back up and password system. Passwords are to be used only by those members of WAM Exec who require full access and should be changed at suitable intervals. They must be stored only in password protected files or locked drawers.

Members requiring read-only access should be given a link to the specific file(s) and this link should be attached to a gmail address which can be erased when their function ends. It should never be shared.

What are the rights of tenants about whom records are kept and should we protect those rights?

Tenants have the right to have their privacy protected and WAM should never share their data with any other body not mentioned in the points above. It should never use WAM data to answer questions about tenants from another body without a legal requirement (e.g. a criminal investigation from a government body with the legal right to require such data).

They have the right to ask WAM what records we keep on them and to see the data. This is normally a simple admin task but should be carried out with due diligence. E.g., we should:

- a) check the request is from the tenant themselves
- b) not share anything that contains data about other tenants (e.g. a letter with two names in a dispute - names may need to be redacted).
- c) not provide it in a way that is open to insecure access (e.g. on a web site or an email no registered on our database)

Chart shows who keeps what for how long. Note user name and password held by chair, sec, area A manager and membership sec. so in theory all could read and edit anything, but chart shows what is normally done unless someone is on holiday, ill etc.

Document/data	Filed in	Until	Edit access	Read access
Tenant list, including co-workers	Google		Membership and asst membership secs, Sec	Overseers by site, area managers, Chair, WBC
Waiting lists	Google		membership sec	asst member sec, area managers and overseers, WBC
Contractor permits	Google		Sec and Chair	Overseers and area managers, WBC
Letters to, from and about tenants	Google	6 years after they leave	Sec and Chair	WBC
List of late payers	Google	Transfer each year and keep for 6 years	Membership sec	Member and asst member sec, chair, WBC
External correspondence	Google	6 years minimum	Sec and Chair	WBC

Application to join waiting list	Google	Tenancy agreed	Membership sec	Overseers by site
Relinquishment form	Emailed to membership / asst membership sec and area manger to process then destroyed.			
Application to be co-worker	Emailed to membership / asst membership sec and overseer to process then destroyed			
Application for discount	Emailed to membership / asst membership sec to process then destroyed			
NTQs	Google	6 years	Chair/sec	WBC