



# Data Protection Policy

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## **DATA PROTECTION POLICY**

Ardenglen Housing Association can provide this procedure on request, in large print, in Braille, on tape or in other non-written format, and in a variety of languages.

### **1. INTRODUCTION**

- 1.1 Ardenglen Housing Association (Ardenglen) is committed to the highest standards of openness, probity and accountability.
- 1.2 Regulatory Standard 5 states that an RSL must “*conduct its affairs with honesty and integrity*”. To ensure this, the Association has clear policy and procedures in place which make sure the organisation acts with transparency, honesty and propriety and avoids any public perception of improper conduct.
- 1.3 Ardenglen recognises that the Data Protection Act 1998 (The Act) is an important piece of legislation to protect the rights of employees, committee members, volunteers, customers, contractors and agents in respect of any personal information that we keep about them, whether electronic (computer based) or manual (paper based).
- 1.4 Ardenglen is registered with the Information Commissioner as a Data Controller under the Data Protection Act, and will ensure that our practices in the handling of personal information are of a high standard and complies fully with the Act. We are required to review our registration on an annual basis.

Our Registration Number is **Z5937922**.

### **2. DATA PROTECTION PRINCIPLES**

- 2.1 The Data Protection Act 1998 lays down 8 principles regarding the collection, storage and use of personal data:
  - It must be obtained and processed fairly and lawfully
  - It must only be processed for limited purposes
  - It must be adequate, relevant and not excessive
  - It must be accurate and kept up to date
  - It must not be kept for longer than is necessary
  - It must be processed in line with the rights of the data subjects
  - It must be kept safe from unauthorised access, accidental loss or destruction
  - It must not be transferred to a country outside of the European Economic Area without adequate protection

### **3. DEFINITION OF TERMS**

3.1 There are various terms used within the Data Protection Act 1998 which are important to understand. These are noted below

#### **3.1.1 Data**

This is information that is either processed by electronic (computer) equipment or by a structured (manual) filing system. This includes emails, written correspondence, notes of meetings (referring to an individual) and notes of telephone conversations (about or with an individual).

Manual records must be “structured in such a way that specific information relating to a particular individual is readily accessible”. Therefore, this fully applies to any organised set of papers about an individual

Personal data is data which relates to a living individual who can be identified from either the data or other information which is in the possession of, or is likely to come into the possession of the data controller. This also includes an expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

It is important to note that the Data Protection Act 1998 covers only personal data. Therefore general information in the form of statistics or similar formats from which individuals cannot be readily identified is not covered.

#### **3.1.2 Sensitive Personal Data**

The Data Protection Act 1998 designates the following categories of information as sensitive personal data:

- Racial or ethnic origin
- Political opinions
- Religious or other beliefs of a similar nature
- Trade Union membership
- Physical or mental health or condition
- Sexual life
- Offences (including alleged offences)
- Criminal convictions or proceedings

Before information on any of the above can be obtained, processed or stored either the individual must give explicit consent or one of a number of conditions must be met. These conditions are:

- The processing of the data is necessary in order to exercise any right or obligation imposed by law upon the Data Controller
- The processing is necessary within legal proceedings or for establishing, exercising or defending legal rights
- The information to be processed relates to equal opportunities monitoring

- The processing is necessary to exercise functions conferred by an enactment of law of statute

Obtaining a disclosure on criminal convictions, collating information on “protected characteristics” to meet the requirements of the Equality Act 2010 would all be covered by one of the above conditions and would therefore not necessarily need the individuals explicit consent under the Data Protection Act 1998

### 3.1.3 **Consent**

This is the “freely given, specific and informed indication” from the data subject (see below) that signifies agreement to their personal data being processed. This must be in written format (writing, email, text message or fax)

### 3.1.4 **Data Processing**

Obtaining, holding, storing, amending or rearranging personal data or extracting information from it.

### 3.1.5 **Data Subject**

This is the individual who is the subject of personal data, for example an “employee”. A company or organisation cannot be a data subject.

### 3.1.6 **Data Controller**

Ardenglen is registered with the Information Commissioner as a Data controller with a Registration Number of Z5937922. Ardenglen is responsible for determining the purpose for which and the manner in which any personal data is processed.

### 3.1.7 **Data Processor**

This is a person other than an employee of the Data Controller who processes data on behalf of the Data Controller. This includes external agents and contractors.

Where processing is carried out by a data processor, the contract must ensure they are subject to the same obligations regarding data protection as the Data Controller.

### 3.1.8 **Notification**

All companies that hold personal data must notify the “Office of the Information Commissioner” regarding what data is held and also the purpose of holding the data. A copy of the Data Protection Notification is attached as Appendix 1.

The Director will review the notification annually to ensure that it covers all personal data that Ardenglen may process.

### 3.1.9 Recipient

In relation to personal data, this is any person to whom data is disclosed. This does not include any person to whom data is disclosed as part of an enquiry they have legal power to make (police, customs, trading standards etc.)

### 3.1.10 Third Parties

In relation to personal data, this is any person other than the “data subject” the “data controller” or authorised data processor

## 4. **DATA PROTECTION CATEGORIES**

4.1 The situation and operation of Data Protection with regard to Employees, Committee Members, Tenants and Housing Applicants are detailed below. As the position is different for each category these should be read depending on the category of the individual concerned.

## 5. **THE EMPLOYMENT PRACTICES CODE**

5.1 The code is not legally binding on employers but represents the Information Commissioner’s recommendations as to how employers should fulfil their legal requirements under the Data Protection Act 1998. In the event of a legal challenge against an employer, a Court of Tribunal can take these recommendations into account and evidence of non-compliance be considered. The code has four parts:

- Recruitment and selection
- Employment records
- Monitoring at work
- Information about workers’ health

5.2 The code is concerned with information that employers might collect and keep on any individual who might wish to work, currently work or have worked for them. In the code the term “worker” includes:

- Applicants (successful and unsuccessful)
- Former applicants (successful and unsuccessful)
- Employees (current and former)
- Agency staff (current and former)
- Casual staff (current and former)
- Contract staff (current and former)

5.3 Some of the code will also apply to others in the workplace, such as volunteers.

## **6. DATA PROCESSING**

- 6.1 Throughout employment and for as long a period as is necessary following the termination of employment, Ardenglen will need to keep information about each member of staff for purposes connected with their employment, including recruitment and termination.
- 6.2 The personal information held will be for management and administrative purposes only.
- 6.3 Ardenglen has a statutory obligation to provide certain information on employees to the Scottish Housing Regulator but this is general information in statistical form providing a breakdown of employees by gender and salary bands. The exception to this is the requirement to state the salaries and other benefits of the Officers and Executive Directors.
- 6.4 There may be other occasions, either now or in the future, on which Ardenglen has a statutory obligation to provide certain information to other bodies. This will normally be in general, statistical format.
- 6.5 From time to time, Ardenglen compares or benchmarks its performance to the performance of other organisations and information relating to employees may be included. This is in a general format and does not contain personal information relating to an individual employee.
- 6.6 The Group has a legal obligation to respond to requests from HM Revenue & Customs for specific personal information about individual employees.
- 6.7 The Director keeps a personal file on each employee containing the following information:
- Information provided by the employee plus any references obtained during recruitment
  - Copy of the Contract of Employment together with any other relevant information about terms and conditions of employment
  - Signed job description
  - Information about performance including copies of appraisals
  - Self-certified sickness absence forms, copies of doctors' statements and correspondence from the employee's doctor or consultant where it has been necessary to obtain this
  - Details of any disciplinary investigations and proceedings
  - Details of any grievances by or about the employee
  - Disclosure & Barring Service (DBS) disclosures and copies of information provided by the employee relating to these

- Training record
  - Contact names and addresses
  - Correspondence with Ardenglen
  - Any other information provided by the employee
- 6.8 Basic employment details and training records are also kept on a Personnel Database software package, accessible only by authorised users (Director, Finance Staff).
- 6.9 The appropriate line manager keeps a personal file on each of their staff members, which may contain the following information:
- Home address
  - Contact details
  - Next of kin
  - Date of birth
- 6.10 The Finance sections keep records and can access electronic information about each employee to enable them to fulfil the company's statutory obligations to HM Revenue & Customs, to pay salaries and to administer the pension and private health schemes. This includes:
- Payroll, tax and national insurance information
  - Original doctors' statements
  - Details of contributions to the pension scheme
  - Details of membership of the private health scheme
- 6.11 Personal information about employee is not disclosed to external agents.
- 6.12 Sickness Absence Records
- Self-certified sickness absence forms are seen only by the appropriate line manager before being passed to the Director to be kept on the personal file.
  - Time management (including flexitime) are accessible only by authorised users (Director and Finance staff).
  - Personal information about actual sickness may be considered and discussed at the appropriate management team meetings only where there is a managerial reason for doing so. In cases of persistent or prolonged absence so that the reasons may be investigated and discussed with the employee.
  - Should it be necessary to obtain a report from the employee's doctor or specialist the employee's explicit consent will be sought. A copy of the

information thus provided will be made available to the employee if requested.

#### 6.14 References

- References for employees are normally provided by the Director or the appropriate Line Manager.
- Before a reference is provided, the employee to whom the reference refers will first be asked if they want the reference to be provided. This also applies if the reference request is unconnected to employment (e.g. mortgage application).
- When an employee leaves they will be asked if they wish references to be provided to future prospective employers.
- An employee does not have the right to see a reference if it is given in confidence for employment purposes by the current employer.
- If an employee asks to see a reference provided by a previous employer or other third party, Ardenglen will only disclose this if it has the consent of the other party or if it is reasonable to comply with the request without this consent.

### 7. **EMPLOYEES RESPONSIBILITIES**

7.1 To assist Ardenglen in fulfilling its obligations under the Data Protection Act 1998, each employee is responsible for:

- Checking that any information provided to Ardenglen in connection with employment is accurate and up to date
- Informing Ardenglen of any changes to information provided, for example change of address, next of kin, full contact name and contact details.
- Informing Ardenglen of any errors in the information provided, as Ardenglen cannot be held responsible for any errors in data that have not been notified/updated by the employee.
- Ensuring that when dealing with members of the public or external organisations by telephone, email, correspondence or face to face, employees take reasonable steps to confirm the identity of the person requesting information (this would be in the form of security questions or physical identification such as a passport or household bill). Ardenglen's Openness and Confidentiality Policy details to who information may be



provided to.

- Ensuring that all electronic communications comply with the Data Protection Act 1998, as these are also subject to the same regulations as all other forms of communication. Ardenglen's IT Policy sets out clearly Ardenglen's expectations and requirements upon employees in this regard.
- Protecting personal data and guarding against data security breaches. If it can be shown that employees knowingly misused, recklessly misused or disclosed personal data to a person or organisation for a purpose outside the scope of Ardenglen's notification under the Data Protection Act 1998, then the Information Commissioner has the power to impose fines on both Ardenglen and on the individuals responsible for the breach.

## **8. RESPONSIBILITIES OF SENIOR MANAGEMENT TEAM**

- To fully understand data protection legislation, having primary responsibility for the promotion and implementation of data protection legislation within Ardenglen
- To ensure that all members of staff under the control of the individual Senior Manager are fully aware of their responsibilities regarding data protection.
- To ensure that all data processing is carried out in accordance with this policy document.
- To periodically review personal files (both physical and electronic) and to instigate the review of staff personal files, with a view to updating, removing and/or destroying irrelevant or out of date information.
- Attached to this policy as Appendix A are the "Document Retention Guidelines" for Housing Associations, as supplied by the National Housing Federation. The guidelines contain both statutory and recommended document retention periods.

## **9. SECURITY OF DATA**

- 9.1 All employees are responsible for ensuring that any personal data that they hold in physical format (e.g. letters, paperwork, point of sale transaction receipts) is kept securely in a lockable filing cabinet, lockable drawer or data safe.
- 9.2 All employees are responsible for ensuring that all electronic data is kept secure in accordance with the IT Policy. This also applies to data that is accessed remotely either during home working, on laptops or mobile devices (phones and

tablets). Data records should not be taken away from the office in an unsecure state (i.e. without being encrypted).

- 9.3 Under no circumstances should electronic sensitive personal data be transferred or stored on any employee, external agency or third party electronic device (This includes Personal Computers, Laptops, Tablets, Mobile Phones or USB/flash removable memory).
- 9.4 Sensitive data such that includes unpublished information about Ardenglen, including confidential changes to services, performance data, IT Systems, financial/business planning or other confidential information, must not be divulged to any third party without the express permission of the Director.
- 9.5 All employees are responsible for ensuring that personal information is not disclosed orally (verbally or in writing) or electronically, be it accidentally or otherwise, to any unauthorised third party. Unauthorised disclosure will usually be a disciplinary matter and in some cases may be considered gross misconduct. It may also result in personal legal liability for the individual employee.

## **10. RECRUITMENT AND SELECTION**

- 10.1 The “Application for Employment” form asks only for information which is essential to ensure that the application receives proper consideration.
- 10.2 A minimal amount of “sensitive personal data” is required on the application form. Where it is required, a sentence will be included on the application form to remind applicants that by providing the sensitive data they are implicitly giving their consent to Ardenglen to use the data.
- 10.3 Applications for employment are expected to be posted, hand delivered to the Association’s office or completed online. Applications sent via email are accepted. Application’s can also be submitted via the Association’s employment agent EVH.
- 10.4 Some posts will require a disclosure from the Disclosure & Barring Service; in such instances, candidates will be made aware in the application pack that such a disclosure will be required.
- 10.5 With all applications are included “Equal Opportunities Monitoring” and “How we recruit and select staff” statements that detail the policies and procedures that are followed. Ardenglen aims to ensure that these comply with the principles of the Data Protection legislation. Interview notes are a particularly sensitive area since candidates have the right to see them.
- 10.6 Completed application forms and interview notes of unsuccessful candidates

are retained, securely stored, for 6 months and then destroyed. Recruitment records and interview notes of successful candidates are transferred to their personal file upon commencement of employment.

## **11. MONITORING OF WORK**

11.1 The Employment Practices Code in relation to Monitoring at Work allows employers to undertake various types of monitoring subject to certain conditions and safeguards.

11.2 Ardenglen has the ability to monitor incoming telephone calls for training purposes. This is not an automatic “record all” process but is a manual option. Recordings are stored securely as voicemail messages within the telephone system.

11.3 Ardenglen has a telephone call logging system that monitors traffic both inbound and outbound for tracking purposes, but does not at the present time report on employees’ phone usage to make sure that they are not abusing company systems and time. Employees are trusted to make minimal use of the telephone for personal calls.

11.4 Where employees are provided with mobile devices for business use, they are allowed to make and receive personal calls, send and receive personal text messages and utilise data allowances, providing that they do not exceed the monthly contract allowances or impact upon business usage requirements. Where allowances are breached or business usage impacted as a result of personal usage, the Association would consider the recovery of costs from the individuals concerned.

11.5 The Association carries out CCTV surveillance at its office for security reasons.

11.6 The Association logs and monitors the use of email and Internet access. Full details of this are contained within the IT Policy.

## **12. COMMITTEE MEMBERS**

12.1 Names and private addresses of Committee Members are available to staff as well as to statutory bodies such as the Scottish Housing Regulator. They are not made available to any other body or person. Tenants, clients and members of the public who wish to contact Committee Members are requested to send correspondence care of the Association. Basic information about Committee Members is published on the Association’s websites (Name and brief description of work experience).

12.2 Personal information provided by Committee Members during their recruitment

or at any time during their period of membership is kept securely by the Director and not divulged to third parties.

12.3 Ardenglen has a statutory obligation to provide certain information about Committee Members to the Scottish Housing Regulator and the Financial Conduct Authority. Other than names and addresses, this is in a generalised, statistical format and does not contain personal information about individual Board Members.

12.4 The amount of personal information held by Committee Members about individual employees is limited to:

- Salaries (information required by in relation to the annual salary review and/or appeals against salary levels)
- Information about disciplinary investigations
- Information about grievances
- Other generalised, statistical data

12.5 Notwithstanding the above, Committee Members should follow the principles of data protection outlined within this document.

12.6 Under certain circumstances, Committee Members may require a disclosure from the Disclosure & Barring Service; in such instances, they will be made aware that such a disclosure will be required.

12.7 Committee Members are also expected to maintain confidentiality about Ardenglen's tenants, clients and activities. Information on this obligation is contained in the Committee Code of Conduct.

### **13. TENANTS OF ARDENGLLEN**

13.1 The same data protection principles apply and should be followed in relation to tenants' records as for employees' records. The Association keeps the following tenant information:

- Tenancy Agreement
- Housing Application (including income/expenditure details)
- Equality & Diversity information (Ethnic Origin, Disability, Religion etc)
- Details of special needs or requirements
- Vulnerability indicators
- Special access arrangements
- Contact names, addresses & contact details (telephone, email etc)
- Next of kin details
- Correspondence with Ardenglen
- Detailed tenancy records
- Any other information provided by the tenant

- 13.2 In particular, tenants' physical information and record files should be kept securely. It is not always practicable to keep these in lockable filing cabinets but, at the very least, they should be filed away at night so that casual visitors to the office cannot gain access to them.
- 13.3 The majority of tenant personal data records are stored within the Association's Housing Management Database (SDM) and within the electronic Association Folder structure. Access is secured and maintained by means of both office access control systems and security passwords. It is vital that these security mechanisms are used appropriately as detailed within the IT Policy.
- 13.4 Information about tenants must not be disclosed to unauthorised third parties and references in relation to a tenant's rent record may be only provided with the explicit written consent of the tenant. Further details and guidance can be found within Ardenglen's Openness and Confidentiality Policy and Procedures.
- 13.5 It is a requirement for information to be exchanged between the Association and the Department of Work and Pensions, Housing Benefit Departments, Citizen Advice Bureaux, Courts and the Police. Protocols should be in place to facilitate such exchange for the benefit of all parties that do not breach the requirements of the Data Protection Act 1998.
- 13.6 Under circumstances where "third party" company schemes (e.g. Home Energy Efficiency Scheme) are available through the Association to its tenants and requests are made by these third parties for personal data. Then specific written consent should be sought from tenants and should be scheme and third party specific.
- 13.7 Where a tenant is known to be violent or to have other personal difficulties that affect visitors, such information should not be provided to contractors in detail. Contractors should only receive details necessary to complete the assigned task/job (e.g. name/address details) and simply be advised that they should not visit the tenant on their own.
- 13.8 Where a tenant appears to have mental health problems, the Association is unable to approach another person or body for assistance without the written consent of the tenant. The exception to this would be in emergency where intervention of a third party would be in the best interests of the tenant.
- 13.9 Specific written consent of the tenant should be sought for pictures taken for publicity purposes. The amount of personal information included in the article or journal should be limited and on no account should the full address or contact details of the tenant be given.

## **14. FINANCIAL SERVICES PROVIDED TO FAIR DEAL LTD**

- 14.1 Ardenglen currently provides Financial Services to Fair Deal Ltd. a registered Care Provider. During the course of this contract, individual information on client care packages and support requirements is provided to Ardenglen to allow the collation of budgets and management accounts.
- 14.2 All information is securely held on Fair Deal's data base and IT system with remote access via password provided to the Ardenglen staff members providing the service. No information on Fair Deal clients is held on Ardenglen's IT systems.
- 14.3 Any physical information and record files on Fair Deal clients is kept securely.

## **15. HOUSING APPLICANTS**

- 15.1 The same data protection principles apply and should be followed in relation to applicants' records as for tenants' records. The Association keeps the following housing applicant information:
- Housing Application (including income/expenditure details)
  - Equality & Diversity information (Ethnic Origin, Disability, Religion etc)
  - Details of special needs or requirements
  - Vulnerability indicators
  - Special access arrangements
  - Contact names, addresses & contact details (telephone, email etc)
  - Next of kin details
  - Correspondence with Ardenglen
  - Any other information provided by the tenant
- 15.2 In particular, applicants' physical information and record files should be kept securely. It is not always practicable to keep these in lockable filing cabinets but, at the very least, they should be filed away at night so that casual visitors to the office cannot gain access to them.
- 15.3 The majority of tenant personal data records are stored within the Association's Housing Management Database (SDM) and within the electronic Association Folder structure. Access is secured and maintained by means of both office access control systems and security passwords. It is vital that these security mechanisms are used appropriately as detailed within the IT Policy.

## **16. RIGHT TO ACCESS INFORMATION**

- 16.1 Individuals have the right to access personal data that has been kept about them either in organised manual files or electronically and includes opinion and "facts".

16.2 All requests to access or inspect personal data must be made in writing to the Director who acts as the Data Protection Compliance Officer for Ardenglen. Requests will also be accepted in writing from a third party representative of the individual concerned. However, Ardenglen will take necessary steps to validate the third party representation before granting any requests to access or inspect data. This will normally include a signed mandate.

16.3 Individuals (and third party representatives) requesting to access or inspect personal data will be expected to provide proof of their identity.

16.4 All data supplied will be in a form which the recipient (and/or third party representative) will be able to understand. If the data is coded, then an explanation of the codes will also be supplied.

16.5 Ardenglen will aim to comply with requests for access to personal data as quickly as possible but, in any case, has a statutory obligation to provide the requested information within 40 calendar days.

16.6 Ardenglen is not obliged to disclose the following categories of data:

- If disclosure of the data also involves disclosing data relating to a third party and the third party does not give consent.
- If the disclosure of the data also involves disclosing the intentions of Ardenglen with respect to the requesting individual (e.g. data held relating to Ardenglen's intention to serve a "Notice of Seeking Possession" need not be disclosed).
- If Ardenglen is in receipt of medical opinion that access to the data is likely to cause serious harm or mental health of the requesting individual.
- If the data in question is legally protected
- If the request is for specific data that would be unreasonably difficult to find (e.g. old/archived electronic data or any physical paperwork that is not held in a filing system).
- Any other exemptions under the Data Protection Act 1998.

16.7 Ardenglen is not obliged to disclose the following categories of data to employees:

- Information on disciplinary matters or performance
- Management forecasting and planning if the release of this information would prejudice the business
- Negotiations with the data subject where these could be prejudicial (for example, in cases of redundancy or redeployment)
- Confidential references given by Ardenglen

16.8 Ardenglen may refuse to meet requests for information that are received more

frequently than once in three months or twice in any twelve-month period. Ardenglen may also refuse to meet any vexatious requests.

16.9 Ardenglen will make a charge of £10 to fulfil each Subject Access Request.

## **17. GRIEVANCES**

17.1 If an employee considers that this policy has not been followed in respect of personal data kept about them, the matter should be reported to their line manager. If the matter cannot be resolved it should be raised as a formal grievance under the Association's grievance procedure contained in the Terms and Conditions of Employment.

17.2 If a tenant, applicant, client or other third party considers that this policy has not been followed in respect of personal data kept about them, the matter should be reported to the Group as a formal complaint using the Complaints Policy & Procedures.

## **18. DOCUMENT RETENTION GUIDELINES**

18.1 It is important to periodically review personal data and files (both physical and electronic) with a view to updating, removing and/or destroying irrelevant or out of date information.

18.2 Electronic data and files should be removed or deleted in accordance with the correct procedures of the software, database or electronic storage method used (in accordance with the Manufacturer/Supplier guidelines). All electronic storage media (such as hard drives or data tapes) should be destroyed or securely wiped using "for purpose" software tools or by an approved media/data destruction company.

18.3 Physical data and files should be securely shredded or disposed of by an approved data/record destruction company.

18.4 Attached to this policy as Appendix A are the "Document Retention Guidelines" for Housing Associations, as supplied by the National Housing Federation. The guidelines contain both statutory and recommended document retention periods.

## **19. TRAINING**

19.1 The Association through its Internal Management Plan is committed to training and developing staff and committee members to their full potential in order to deliver a high quality of service in all areas of its business.



19.2 The Management Committee induction programme includes an overview of this policy, including responsibilities for the promotion and delivery of openness and confidentiality as relevant to their job descriptions. Committee members will receive updates on these issues and specific training as required.

## **20. EQUALITIES AND DIVERSITY**

20.1 This policy will be implemented in line with our Equality and Diversity Policy and is subject to an Equality Impact Assessment to assess the likely or actual effects of the policy to our customers in respect of their disability, age, gender, race, religion/belief, sexual orientation or gender identity to ensure equal and fair access for all.

## **21. MONITORING AND REPORTING**

21.1 The Association will use appeals, complaints, comments or suggestions from users of this policy to monitor its effectiveness. These will also be used to prompt a review of the policy where necessary.

## **22. REVIEW**

22.1 This Policy will be approved by the Management Committee. It will be reviewed every three years unless amendment is prompted by a change in legislation, or monitoring and reporting reveals that a change in Policy is required sooner.

## **23. DISTRIBUTION**

23.1 This policy will be made available to every employee and committee member and will be made freely available to any tenant or interested party.

## **17. LEGAL FRAMEWORK**

- The Data Protection Act 1998
- Equality Act 2010

## **14. RELATED POLICIES**

- Openness and Confidentiality Policy
- ICT Policy
- Terms and Conditions of Employment
- Equal Opportunities Policy
- Complaints Policy
- Financial Regulations
- Whistleblowing Policy
- Codes of Conduct

**--- END OF POLICY ---**

## **APPENDIX A – DOCUMENT RETENTION FOR HOUSING ASSOCIATIONS**

**“Please refer to separate Policy - Document Retention Schedule”**