

## Clydebank Housing Association

**To: Management Committee**  
**From: Head of Housing Services**  
**Date: 24 September 2020**  
**Subject: Data Protection Checklist**

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This report is intended for information.

As part of our Management of information & Data Protection policy, we are required on a two yearly basis to complete an audit checklist. The purpose of this is to ensure compliance, identify any areas of action required and contribute to any future review of the policy.

The checklist is attached to this report.

During the last audit in 2018, there were two items identified as requiring action. Details of these and the outcomes are:

1. Data protection to be included in the 2019/20 internal audit programme (Chief executive responsible) – Included in audit programme and audit took place in April 2020. Included in future audit programmes.
2. Return of 3 contractor notices still outstanding and notices still to be sent to other housing providers locally. These are actively being pursued as part of ongoing GDPR compliance. – All three notices were returned and requests now part of ongoing procurement procedures and GDPR checklist.

This year's audit has identified the following issue to be addressed:

1. Updated data protection training to be arranged for both staff and Management Committee. We aim to have this carried out in early 2021.
2. ICO certificate for Clydebank Housing Association to be renewed in December 2020. Renewal reminder is in place.

## Data Protection Checklist

This checklist is intended to be completed on a self-assessment basis to help the Association identify possible areas for action. An assessment will be carried out by the Head of Housing Services (who is the Association's Data Protection Control Officer) every two years and a report prepared for the Management Committee.

An explanation of each response should be provided in Section 1 and any required follow-up action, together with timescales noted in Section 2.

### *Current Position*

Question		Response (with explanation)
1.	Is there a written policy covering data protection issues?	Yes – current Data Protection policy approved May 2020 (incorporating GDPR), due for review again in May 2023.
2.	Is there a contact person for data protection?	Yes – the Head of Housing services as outlined in the Data protection policy.
3.	Are there fair obtaining/opt in boxes on your literature/forms?	Appropriate notices on application forms, policies etc advising that information only used for required purposes etc. All updated in line with GDPR regulations prior to 29/05/18
4.	Is there a procedure for responding to requests for information, and a log of who it is disclosed to?	Yes, requests maintained and managed by the Head of Housing Services and documented in Data Protection and Data Breach policies.
5.	Are comments by staff in data records professionally expressed? – would they survive a subject access request?	Yes, staff training ensures all staff entering records are aware of DP act, GDPR and associated legislation, the necessity for this and appropriate entries/language. Management training took place on 07/03/18, with staff training on 01/11/17. Departmental inductions for each department cover data protection. Updated training to be arranged for early 2021.
6.	Are access controls clear and robust?	Yes, as laid out in policy and procedures. IT data files have access limited only to staff that require the specific information. All upgrades to Housing Management systems will afford a similar functionality.
7.	Do disclosure procedures accept the possibility of third parties	Yes, staff are trained on this and DPCO is point of contact for staff requiring clarification

Question		Response (with explanation)
	trying to obtain data by deception? Do staff know how to handle such requests?	or dealing with requests deemed suspicious. This is laid out in data breach policy and associated procedures.
8.	Are your Data Protection registrations up to date and accurate?	Yes, currently valid until 2 December 2020 for CHA and 8 August 2021 for CHA Power Ltd. Both will be reviewed in advance of submission dates.
9.	Have staff and the Management Committee undertaken Data Protection awareness training?	Yes, most recently November 2017 for staff and March 2018 for Management Committee. Both incorporated GDPR. Updated training to be arranged early 2021.
10.	Do you review access rights of employees leaving the Association to ensure data cannot be removed or passed to a third party?	Yes, responsibility of departmental manager to notify IT of staff leaving, also IT staff have own checklist in place provided by the Finance section.
11.	Has data protection audit been included in the internal audit programme?	Yes – last audited April 2020, to be included in future internal audit plans.
12.	Do you have a written contract with any third party who can access personal information, about their information processing and security?	Yes - GDPR fair processing notices to be sent to all tenants, applicants, contractors and other customers/partner agencies. Ongoing as necessary.

Assessing Officer: Joe Farrell

Date: 24 September 2020