

WORKING FROM HOME POLICY
(DATA PROTECTION CONSIDERATIONS)



Kingsbridge
Cleddans

HOUSING ASSOCIATION LIMITED

APPROVED	28 March 2023
Date of Next Review	March 2026

1.0 INTRODUCTION

Since the start of the Coronavirus pandemic, many people have been working remotely from home instead of their usual place of work. Even as the effects of the pandemic reduce, it seems clear that working from home will continue as new ways of working are adopted. Whether working from an office or remotely from home, data protection laws need to be complied with.

The following guidelines should be followed in all situations where staff are working from home or away from the office.

2.0 PURPOSE OF THIS DOCUMENT

This document sets out acceptable policy for compliance with Data Protection Act 2018 and the UK GDPR for users for accessing, viewing, modifying, and deleting Kingsridge and Cleddans Housing Association's data (ie, processing personal data) and accessing its systems whilst away from the office, ie, in remote offices or your home.

3.0 DEFINITIONS

- 3.1 **Data Protection Law** means the UK General Data Protection Regulation; the UK Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002 (PECR); and any laws replacing, amending, or supplementing the same and any other applicable data protection or privacy laws.
- 3.2 **Remote equipment / Home Worker** refers to users using either company provided or your own device or systems or applications, to access and store company information, at your home or remotely, typically connecting to Kingsridge Cleddans Housing Association's Wireless Service or VPN (whichever is relevant).
- 3.3 **Data Controller** - The Data Controller is a person, group, or organisation that alone or jointly with others determines the purposes and means of the processing of personal data. Kingsridge Cleddans Housing Association is the Data Controller for its employees' personal data and other personal data, e.g., tenants.
- 3.4 **User** – A member of staff, employee, contractor, visitor, or another person authorised to access and use Kingsridge Cleddans Housing Association's systems.
- 3.5 **Data Processor** – a person, group or organisation that processes personal data on the instructions of a Data Controller set out in a written contract

4.0 POLICY INTRODUCTION

This policy covers the use of electronic devices which could be used to access Kingsridge Cleddans Housing Association's systems and store information, alongside employees' own personal data. Such devices include, but are not limited to, smart phones, tablets, laptops, and similar technologies.

Kingsridge Cleddans Housing Association, as the Data Controller, remains in control of the data regardless of the ownership of the device, or the location in which the data is

WORKING FROM HOME POLICY (DATA PROTECTION CONSIDERATIONS)

processed. As an employee of Kingsridge Cleddans Housing Association you are required to keep any company information and data securely and comply with Data Protection law. You are required to assist and support Kingsridge Cleddans Housing Association in carrying out its legal and operational obligations, including co-operating with the IT team should it be necessary to access or inspect company data stored on your personal device or equipment at your home.

Kingsridge Cleddans Housing Association reserves the right to refuse, prevent or withdraw access or permissions for users to work from their homes and/or particular devices or software where it considers that there are unacceptable security, or other risks, to its employees, business, reputation, systems, or infrastructure.

5.0 Data Protection, Security and Confidentiality of Materials

5.1 You must follow Kingsridge Cleddans Housing Association's policies and procedures in relation to working with personal data as if you were still based in the office. However, there are additional risks relating to working remotely. You should keep the following in mind:

- a) The data protection principles still apply and need to be adhered to, i.e., you should only access personal data that is needed for "specified, explicit and legitimate purposes." You should "limit what you take home to only what is necessary" and keep it there for "no longer than is necessary." You must consider "appropriate security," both at home and in transit. Additionally, if required to, you must be able to provide Kingsridge Cleddans Housing Association with evidence you are complying with these principles.
- b) Never leave a computer with personal data on screen. An unauthorised person reading personal data is a data breach.
- c) Never leave your computer 'logged on' when unattended. Think about who may access the device when you are not around – whether deliberate or accidental.
- d) Ensure that rooms containing computers and other equipment, are secure when unattended, with windows closed and locked and blinds or curtains closed.
- e) If making a phone or online conference call remember that it is confidential and consider who is around who might overhear.
- f) Levels of Home Security should be at the same level as at work.
- g) You should only work within Kingsridge Cleddans Housing Association's approved systems, e.g., Microsoft Office 365, Teams etc.
- h) Do not hold person identifiable information on electronic devices. If you must download a document to your personal device, ensure it is deleted as soon as possible.
- i) If using your own device, check for automatic uploads to Cloud storage systems. For example, if you have subscribed to iCloud or Dropbox, you may inadvertently

be uploading Kingsridge Cleddans Housing Association's documents to your personal account in these applications. You should disable these uploads whilst you are doing Kingsridge Cleddans Housing Association work.

- j) Any paper taken from the office to work at home must be protected in transit and in your home.
- k) Paper files should be 'signed out' from the office and 'signed in' again when returned.
- l) Ensure paper is transported safely – in a wallet or case.
- m) Keep paperwork secure at home and out of sight of members of your family and others.

6.0 Loss or Theft

In the event that your device is lost or stolen, or its security is compromised, you MUST promptly report this to Kingsridge Cleddans Housing Association's IT partners, in order that they can assist you to change the password to all company services and report this as a data breach if appropriate. (You must also cooperate with the IT partners in wiping the device remotely, even if such a wipe results in the loss of your own data, such as photos, contacts, and music.)

Kingsridge Cleddans Housing Association will not monitor the content of your personal devices, however the IT partners, with explicit consent from the Association, reserves the right to monitor and log data traffic transferred between your device and Association systems.

In exceptional circumstances, for instance where Kingsridge Cleddans Housing Association requires access in order to comply with its legal obligations (e.g., obliged to do so by a Court of law or other law enforcement authority such as the Information Commissioner) Kingsridge Cleddans Housing Association will require access to company data and information stored on your personal device. Under these circumstances, all reasonable efforts will be made to ensure that Kingsridge Cleddans Housing Association does not access your private information.

7.0 Approval for Working Remotely

The Director will consider requests for home working in consultation with individual members of staff.

8.0 Compliance and Disciplinary Matters

Compliance with this policy forms part of the employee's contract of employment and failure to comply may constitute grounds for action, under Kingsridge Cleddans Housing Association's disciplinary policy.