

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 company limited by guarantee (Worthing Allotment Management Limited), 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 Microsoft OneDrive or 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.

In order to carry out their WAM functions, some members of the Exec require access to the whole data set, along with editing rights to amend. They will also need to manage data access for 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 the WAM operation to continue.

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?

Microsoft OneDrive and Google Drive have an automatic back up and password system and with two step verification. 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 secure link to the specific file(s) and this link should be attached to their @wamplots.org email 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:

Chart shows who keeps what for how long. Note username 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	Secure online Data Storage		Chair, Membership & Asst Sec, Sec, Digital Manager	Overseers by site, Site managers, WBC
Waiting lists	Secure online Data Storage		Chair, Membership & Asst Sec, Sec, Digital Manager	Overseers by site, Site managers, WBC
Contractor permits	Secure online Data Storage		Chair, Sec, Digital Manager	Overseers and Site managers, WBC
Letters to, from and about tenants	Secure online Data Storage	6 years after they leave	Chair, Sec, Digital Manager, Overseers and Site managers by site	WBC
List of late payers	Secure online Data Storage	Transfer each year and keep for 6 years	Chair, Membership & Asst Sec, Sec, Digital Manager	WBC
External correspondence	Secure online Data Storage	6 years minimum	Chair, Sec, Digital Manager	WBC
Application to join waiting list	Secure online Data Storage	Tenancy agreed	Membership sec	Site Manager and Overseers by site
Relinquishment form	Emailed to membership / asst membership sec and Site manager to process then destroyed.		Membership sec	
Application to be co-worker	Emailed to membership / asst membership sec and site manager/overseer to process then destroyed		Membership sec	

Application for discount	Emailed to membership / asst membership sec to process then destroyed		Membership sec	
NTQs	Secure online Data Storage	6 years	Chair, Sec, Digital Manager	WBC

- 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 not registered on our database)