



Information Sharing Policy

Version Control

CONTROLLED DOCUMENT - VERSION MANAGEMENT BY SHAREPOINT

Version Detail

Updated in line with GDPR

Reviews

ANNUAL REVIEW

Information Sharing Policy



Purpose

This policy ensures that we do not share Personal Data without considering the appropriate lawful basis, and that we comply with current Data Protection legislation.

To ensure that we comply with the requirements of the Freedom of Information Act 2000.

Interpretation

Data Protection Legislation: the UK Data Protection Legislation and the General Data Protection Regulation ((EU) 2016/679) and any other directly applicable European Union regulation relating to privacy.

UK Data Protection Legislation: any data protection legislation from time to time in force in the UK including the Data Protection Act 2018 or any successor legislation.

Scope

This policy applies where:

- Personal Data is requested in the following circumstances:
 - Requests from individuals to access their own Personal Data in line with GDPR requirements, including requests:
 - to access Personal Data (referred to as a Subject Access Request);
 - to rectify Personal Data;
 - for the erasure of Personal Data;
 - to restrict the processing of Personal Data;
 - for the porting of Personal Data;
 - to stop the processing of Personal Data;
 - not to be subject to automated decision-making.
- Personal Data is requested by external organisations including customers, clients, contractors, emergency services and other service providers;
- A Freedom of Information request is received.

Responsibility

The Data Privacy & Compliance Manager and each Contract Manager is responsible for ensuring that their team is aware of this Information Sharing Policy and the associated Data Protection Policy, Data Retention Policy and Data Breach Policy.

A clear audit trail of the sharing process must be kept for each Personal Data or Freedom of Information request received as set out in this policy.

Procedures

"Personal Data" in this context means any information relating to an identified or identifiable data subject. An identifiable data subject is anyone who can be identified, directly or indirectly, by reference to an identifier, such as a name, identification number or online identifier.

"Processing" means any operation or set of operations that is performed on Personal Data, such as collection, use, storage, dissemination and destruction.

Where a Personal Data or a Freedom of Information access request is made the Data Privacy & Compliance Manager ("**DPCM**") (data.privacy@pinnaclegroup.co.uk) and the relevant Contract Manager must be notified immediately as outlined below.

The DPCM will decide, with assistance from the Contract Manager, what can be disclosed and in what format.

Information Sharing Policy



Where there has been a Personal Data breach or a suspected Personal Data breach please refer to the Data Breach Policy, and notify the DPCM and the Contract Manager immediately in accordance with that policy.

Notification of a request for information should be made immediately on receipt using the form at Attachment 1 (Part 1)

Type of Request	Response Time
Personal Data request (including CCTV) made by an individual	One month to respond to the request (if the request is complex or numerous this can be extended by two further months).
Personal Data request made by police / emergency services (including CCTV)	As specified by the requestor.
Personal Data request made by <i>contractual</i> third party (e.g. client, sub-contractor)	DPCM to confirm - refer to specific contract for required response timescales.
Personal Data requests from other organisations: Social Services Utility companies Council tax departments	As specified by the requestor.
Freedom of Information request	DPCM to confirm - refer to specific contract for required response timescales.

CCTV

CCTV systems are used to monitor and/or record the activities of individuals, and as such they process individuals' Personal Data. Take care to ensure that unauthorised individuals do not have access to view any CCTV data. Wherever possible, the viewing of recorded images or monitoring should be carried out in a restricted area such as a designated secure office.

Disclosure of information from CCTV systems must be controlled and consistent with the purpose(s) for which the system was established. Any Personal Data requests (whether from individuals, or third parties such as the police) will be considered by the DPCM, who will clearly establish the reasons for the data request by reference to the relevant contract and the Data Protection Legislation and decide whether it is appropriate for the data to be shared.

Sharing Information with Contractors

It is understood that employees will need to share information (which could include Personal Data) with contractors / third parties as part of performing their everyday duties. In this event:

- Refer to the relevant information sharing agreement for specific requirements. Speak to the DPCM for further assistance;
- Share information on a 'need to know' basis only;
- Consider the purpose of the request, and share only as much as is necessary;
- Share any information securely;
- Remind the contractor that the information is confidential and only to be used for the purposes of the contractual services being carried out;

Information Sharing Policy



- Consider what would the resident / our client expect of us?

Information Sharing Agreements

Some clients may require us to enter into a separate Information Sharing Agreement with them. Forward any requests for this to the DPCM.

Review

This policy will be reviewed annually. A change to the ISMS environment may trigger an unscheduled change if required.

Information Sharing Policy



Attachment 1

Data Request Form – Part 1 (Employee to complete)	
Type of request	<input type="checkbox"/> Subject Access Request <input type="checkbox"/> Rectify Personal Data <input type="checkbox"/> Erasure of Personal Data <input type="checkbox"/> Restrict processing <input type="checkbox"/> Porting <input type="checkbox"/> Stop processing <input type="checkbox"/> Not subject to automated decision-making <input type="checkbox"/> Third party Personal Data request <input type="checkbox"/> FOIA request
Date request received	
Details of requestor / request	
Surname:	Forename(s):
Former surname(s) (where relevant):	
Postal address:	
Telephone number:	Email:
Relationship with Pinnacle:	
<input type="checkbox"/> Current Tenant/Lessee <input type="checkbox"/> Current Employee <input type="checkbox"/> Other (please specify) _____ <input type="checkbox"/> Former Tenant/Lessee <input type="checkbox"/> Former Employee <input type="checkbox"/> Police	
Precise description of data requested:	

Information Sharing Policy



Data Request Form – Part 2 (DPCM to complete)

Reference Number: []

Fees requested? Yes / No **Payment Date:**

ID verified:

Passport Driving Licence

Other (please specify) _____

Interim response date:

Final response date:

Do we hold the data requested?

Yes / No

What is the format of the data held?

CCTV Email

Letter Formal electronic record

Other (please specify) _____

Is it appropriate for data to be shared?

Yes / No (and state reasons)

Date response issued to requestor:

Attach copy of response to this form:

Approved by:

Data Privacy & Compliance Manager