

## Wales Accord on the Sharing of Personal Information

### Information Sharing Protocol for

Local Authorities, Housing Agencies and Dyfed-Powys Police for managing tenancy agreement breaches.

**Version** Final – V2

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**Quality Assurance Group** WASPI Mid and West Wales QA Group

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## 1 Introduction to this ISP

- 1.1 This Information Sharing Protocol (ISP) is supplementary to the Wales Accord on the Sharing of Personal Information (WASPI) and has been agreed following consultation between the participating partner organisations.
- 1.2 This ISP is intended to help practitioners understand what information can be shared between the listed partners for the stated purpose(s). It also provides assurance that the partners have considered the requirements of data protection legislation.

This ISP has been prepared to support the regular sharing of personal information between Dyfed Powys Police and each Local Authority or Housing Agency in relation to complaints received about criminal activity or anti-social behaviour (ASB) at premises owned by the local authorities and the relevant housing associations.

- 1.3 Personal information is shared for the purpose of enabling the partner agencies to ascertain the nature and extent of the criminal activity or ASB to consider the legal rights of the partner agencies and the enforcement action (if any) that the partner agencies can take in order to enforce the relevant tenancy agreements and/or to prevent further crime and disorder or ASB in or near premises owned by the local authorities and the housing associations.
- 1.4 The purpose of information sharing is to reduce and prevent incidents of crime and ASB at premises rented by Local Authorities and housing associations in the Dyfed-Powys Police area. **This ISP does not cover the sharing of information between Local Authorities or Housing agencies/associations.**

## 2 The information sharing partner organisations

- 2.1 The table below sets out the organisational partners to the ISP, the key contact points and the departments, divisions and teams typically involved in sharing information for the purposes described in this ISP.

Information Sharing Partner Organisations	Owner / Point of contact	Departments / Divisions / Teams
Dyfed Powys Police	Data Protection Manager	Data Protection Dep't & Neighbourhood teams
Carmarthenshire County Council	Team Leader, Housing Enforcement	Housing Team Member
Pembrokeshire County Council	Principle/Senior Housing Officer	Housing Team Member
Ceredigion County Council	Housing Strategy Manager	Homelessness+ Housing Option Team
Powys County Council	Service Manager, Tenancy Services	Housing Services Team member
Newydd Housing Association	Housing Team Leader	Housing Team Member
Barcud Housing Association (Merger of Mid-Wales HA & Tai Ceredigion)	Team Leader, Community Housing	Community Housing Team Member
Grwp Cynefin	Housing Manager	Housing Team Member
Bro Myrddin Housing Association	Housing Services Manager	Housing Team Member
Family Housing Association Wales	Governance and Improvement Manager	Housing Officer

Ateb Group	Housing Manager	Area Housing Team Member
Wales & West Housing Association	Corporate Information Manager	Community Housing Team Member
Melin Homes	Community Safety Team Leader	Housing Team Member
Pobl Housing Association	Head of Housing	Community Safety Team Member
Clwyd Alyn Housing Association	Head of Residential Services	Housing Officer
Ty Glas Housing Association	Head of Residential Services	Housing Officer

- 2.2 The ISP owners / points of contact have overall responsibility for this ISP within their respective organisations and must therefore ensure the ISP is disseminated, understood and acted upon by relevant practitioners.
- 2.3 The owner / point of contact for each partner organisation will regularly monitor and review the use of this ISP to ensure information is shared effectively and appropriately.
- 2.4 Once the ISP has been assured, each partner organisation will nominate a signatory to sign the ISP at Appendix C. The signatory will be an appropriate person from the partner organisation who can sign on behalf of the organisation.

### 3 Specific organisational / practitioner obligations

- 3.1 Any breaches of security, confidentiality and other violations of this ISP must be reported in line with each partner organisation's incident reporting procedures. Consideration should be given to sharing the outcome of any investigation, where appropriate, with other partners to the ISP.
- 3.2 Practitioners who share information in line with this ISP should make themselves aware of, and adhere to, their organisation's Information Governance and records management procedures; in particular the provisions that relate to collecting, processing and disclosing personal information.
- 3.3 Every reasonable step should be taken to ensure that inaccurate personal data are erased or rectified without delay. Consideration must be given to advising partner organisations that they may have received inaccurate information. In circumstances where partner organisations cannot be informed, advice should be taken from an Information Governance lead (or equivalent).

### 4 Legislative / statutory powers

**STAFF SHOULD NOT HESITATE TO SHARE PERSONAL INFORMATION IN ORDER TO PREVENT ABUSE OR SERIOUS HARM, IN AN EMERGENCY OR IN LIFE-OR-DEATH SITUATIONS.**

**IF THERE ARE CONCERNS RELATING TO CHILD OR ADULT PROTECTION ISSUES, THE RELEVANT ORGANISATIONAL PROCEDURES MUST BE FOLLOWED**

- 4.1 The sharing arrangements described in this ISP take into account the relevant data protection legislation, the Human Rights Act 1998 and the common law duty of confidence.

- 4.2 Before sharing personal information, partner organisations must have identified a clear legal basis for doing so.
- 4.3 Data protection legislation includes the concept of:
- ‘**personal data**’; any information relating to an identified or identifiable (living) natural person, and
  - ‘**special categories of data**’ / ‘**sensitive processing**’; personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation
- Whilst information about deceased people is not covered by data protection legislation, data about deceased people is covered by a similar level of confidence.
- 4.4 Further information and guidance on lawful processing of personal information can be found on the Information Commissioner's website; [www.ico.org](http://www.ico.org)
- 4.5 In order for sharing to be lawful:
- At least one legal basis in each of the two tables below needs to be met (this is based on the assumption that services supported by ISPs will be processing special categories of data / undertaking sensitive processing).
  - Organisations need to be specific and should not normally select more than one legal basis per table.
  - Where more than one legal basis is selected, an explanation should be provided in the Pre Quality Assurance Checklist.
- 4.6 The legal bases have been streamlined to those likely to be most relevant to public service providers. Other legal bases exist and may be added to the table if required. Clear notes should be added to explain how any additional legal basis is relevant.
- 4.7 Partner organisations also need to ensure they take into account the Data Protection Act 2018 and any additional requirements it places on the use of the legal bases set out in Articles 6 and 9 of GDPR (see Part 2 of the Act) and processing for the ‘law enforcement purposes’ (see Part 3 of the Act). The ICO has guidance on this matter and queries about the relevance of any legal basis should be raised with an Information Governance lead.
- 4.8 Consent to process personal data should not be confused with consent to treat patients. The two are separate and should not be confused or merged.

**Table 1 - Article 6 Personal Data**

Legal basis	Check box / Notes
General processing	
Necessary for compliance with a legal obligation – Art 6(1)(c)	<input checked="" type="checkbox"/> <p><i>Local authorities have powers under section 2 of the <b>Local Government Act 2000</b> to promote or improve the social well-being of their area. This provides an implied power to share information with other statutory services and the independent sector.</i></p>

<p>Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)</p>	<p><input checked="" type="checkbox"/></p> <p><b>Section 115 Crime and Disorder Act, 1998</b> permits the disclosure of personal information that may otherwise be prohibited to support local crime and disorder strategies in accordance with the objectives specifically outlined within it. There is not a compulsion to disclose and the organisation must make its own decision; however, the requirements of the common law duty of confidence and the Data Protection Act 2018 must be still met. Therefore, information given in confidence must not be disclosed unless there is a clear overriding public interest to do so.</p> <p><b>Section 219 of the Housing Act 2004</b> permits the disclosure of information to registered social landlords under section 115 (2) of the Crime and Disorder Act. The legislation authorises the disclosure of information to a person registered under section 1 of the Housing Act 1996 as a social landlord</p>
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**Table 3 - Article 10 - Personal Data about criminal convictions, offences or related security measures**

<p>The sharing of personal data relating to criminal convictions, offences or related security measures</p>	<p>Processing is:</p> <p><input checked="" type="checkbox"/> Carried out under the control of an official authority / competent authority</p> <p>_____ and _____</p>
	<p><input checked="" type="checkbox"/> Meets a relevant condition in Part 1, 2 or 3 of Schedule 1 of the Data Protection Act 2018. The relevant condition is:</p> <p>Part 3 – Legal Claims - (a)is necessary for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings),</p> <p>(b)is necessary for the purpose of obtaining legal advice</p> <p>(Consideration of housing agency to evict/take action against tenant for breach of tenancy agreement)</p>

**Table 4 - Competent authorities for Law Enforcement Purposes**

<p>Processing <b>personal data</b> for law enforcement purposes</p>	<p>The Data Protection Act 2018, Part 3, Chapter 2, Section 35(2) outlines the legal bases for sharing personal data for law enforcement purposes. The processing is based on law and</p> <p><input checked="" type="checkbox"/> 35(2)(b) The processing is necessary for the performance of a task carried out for that purpose by a competent authority.</p>
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## 5 Personal information to be shared

- 5.1 Only the **minimum necessary** personal information consistent with the purposes set out in this document can be shared. Anonymised and pseudonymised information should be used where necessary.
- 5.2 Information provided by partner organisations will not generally be released to any third party without prior consultation with the originating partner organisation.
- 5.3 An information reference table at Appendix B provides details of the information exchanges associated with this ISP, including the typical categories of information shared, the organisations involved and the parts of the organisation typically involved. As controllers in their own right, partner organisations are responsible for ensuring the appropriate staff have access to personal information that is adequate, relevant and limited to what is necessary for the intended purpose.
- 5.4 The following table sets out the personal information commonly shared to identify data subjects and ensure partner organisations are referring to the same data subject:


Personal identifiers	Select all that apply
Name (including aliases)	<input checked="" type="checkbox"/>
Date of birth	<input checked="" type="checkbox"/>
Address	<input checked="" type="checkbox"/>
Postcode	<input checked="" type="checkbox"/>
Other reference number (eg NHS number, National Insurance number, any system/service number )	<input type="checkbox"/>
Start Date of tenancy and section of the tenancy agreement where it is believed they may have breached.	<input checked="" type="checkbox"/>

## 6 Data Subjects' Rights

- 6.1 Data protection legislation provides various individual rights for data subjects. Advice on how these rights should be met should be sought from each organisation's Information Governance representative, Data Protection Officer or equivalent. Specific guidance on these rights is available on the Information Commissioner's website; [www.ico.org](http://www.ico.org)
- 6.2 The following paragraphs refer to key rights associated with sharing personal information.
- 6.3 Unless doing so would risk harm to them or others, or hinder any investigation or legal proceedings, data subjects should be informed how and why their personal information will be processed and who it is shared with (the Right to be informed). Ideally, this information – often provided in what is commonly referred to as a privacy notice - will be provided at the first point of contact. It can be part of a registration / consent form or a standalone document.
- 6.4 A layered approach is often appropriate. This could involve a high level organisational statement supplemented by specific service level information; for example a website or leaflet and verbal information provided by a practitioner.
- 6.5 Information should be clear and particular care should be taken when relying on consent as the legal basis for sharing information, or where working with children, as

there are additional requirements to consider. Further information on the 'Right to be Informed' is available on the Information Commissioner's website; [www.ico.org](http://www.ico.org)

6.6 For the purposes of this ISP, partner organisations should set out below how they meet the requirements of the Right to be informed. Ideally, a consistent message will be provided and it may be helpful to agree a standard service level privacy notice.

Name of Organisation	Method of Informing (select any that apply)	Name of document / website (eg website address, leaflet/form name)	Comments
Dyfed-Powys Police	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.dyfed-powys.police.uk">www.dyfed-powys.police.uk</a>	 Disclosure Request Form 2020 V.2.doc
Carmarthenshire County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.carmarthenshire.gov.uk">www.carmarthenshire.gov.uk</a>	
Pembrokeshire County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.pembrokeshire.gov.uk">www.pembrokeshire.gov.uk</a>	On housing application form also.

Ceredigion County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.ceredigion.gov.uk/your-council/data-protection-freedom-of-information/data-protection/privacy-notice/">http://www.ceredigion.gov.uk/your-council/data-protection-freedom-of-information/data-protection/privacy-notice/</a>	
Powys County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	<a href="https://customer.powys.gov.uk/privacy">https://customer.powys.gov.uk/privacy</a>	All new tenants sign a declaration at the start of their tenancy to acknowledge that the CC may share info with other social landlords/Police/Gov't agencies for fraud & prevention of crime and disorder.

Newydd Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.newydd.co.uk/about-us/our-privacy-notice">http://www.newydd.co.uk/about-us/our-privacy-notice</a>	
Barcud Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	<a href="https://www.barcud.cymru/corporate-documents/">https://www.barcud.cymru/corporate-documents/</a>	
Grwp Cynefin	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	Privacy notice on website <a href="http://www.grwpcynefin.org">www.grwpcynefin.org</a>	A paper copy would be provided to anyone who requested it.
Bro Myrddin Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.bromyrdin.co.uk">www.bromyrdin.co.uk</a> Privacy Notice included as part of Data Protection Policy but leaflet will be created	
Family Housing Association Wales	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	Housing Assessment Forms <a href="http://www.fha-wales.com">www.fha-wales.com</a>	Tenancy Agreements
Ateb Group	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	<a href="http://atebgroup.co.uk">atebgroup.co.uk</a>	Tenants were written to prior to the 25 <sup>th</sup> May, 2018 to tell them about new GDPR regulations and that further info could be found on their website.
Wales and West Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Privacy Policy Information notices Data Collection forms <a href="http://www.wwha.co.uk">www.wwha.co.uk</a>	

Melin Homes	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.melinhomes.co.uk/privacy-policy">www.melinhomes.co.uk/privacy-policy</a>	
Pobl Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Privacy Notice Information <a href="http://www.poblgroup.co.uk">www.poblgroup.co.uk</a>	
Clwyd Alyn Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Organisation website and privacy notice. <a href="http://www.pennaf.group.co.uk">www.pennaf.group.co.uk</a>	
Ty Glas Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Organisation website and privacy notice. <a href="http://www.pennaf.group.co.uk">www.pennaf.group.co.uk</a>	

- 6.7 All participating organisations will have in place policies and procedures to uphold the confidentiality, integrity and availability of personal information with specific reference to the retention, storage and disposal of records.
- 6.8 Requests for the information referenced in this ISP will be dealt with in accordance with each partner organisation's relevant policies and procedures.
- 6.9 Each partner organisation will put in place a formal procedure by which data subjects, partner organisations and practitioners can direct any complaints regarding the information sharing practices documented in this ISP.
- 6.10 There is an expectation that partners to this ISP will work together to keep all partners informed of any complaints or requests for information received from data subjects or third parties. The partners will also keep each other informed of any problems

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associated with the information sharing practices documented in this ISP and there is an expectation that they will collaborative to develop and improve these practices.

## **7 Information security**

- 7.1 Each partner organisation must have an appropriate and adequate security framework.
- 7.2 Practitioners carrying out the functions outlined in this ISP should make themselves aware of, and adhere to, their organisation's information security policies and procedures.
- 7.3 A detailed list of agreed methods for the safe and secure transfer of personal information is documented within Appendix B.
- 7.4 All partners must ensure adequate and appropriate training on the subjects of data protection and confidentiality is provided to all staff with access to personal data.

## **8 Review of this ISP**

- 8.1 This ISP will be reviewed two years from signing this document or sooner if appropriate.

## 9 Appendix A – Glossary of Terms

Term	Definition
<b>Data Protection Act 2018</b>	<p>The UK's third generation of data protection law replaces the previous Data Protection Act 1998. The 2018 Act accepts the standards and obligations set by GDPR and, where GDPR allows, makes specific provisions relevant to the UK.</p> <p>The 2018 Act also transposes EU Data Protection Directive 2016/680 (Law Enforcement Directive) into domestic UK law.</p> <p>It is important the UK GDPR and the DPA 2018 are read side by side.</p>
<b>Data Protection Officer</b>	<p>Certain categories of organisation, including any public body or authority (except courts in their judicial capacity) are required to designate a suitably qualified Data Protection Officer (DPO). The tasks of the DPO are set out in Article 39 of GDPR.</p>
<b>Data subject</b>	<p>A 'data subject' is an identified or identifiable natural person. Organisations may refer to data subjects as service users, patients, clients, citizens, etc but for consistency, WASPI framework documentation refers to data subjects.</p>
<b>GDPR</b>	<p>The UK General Data Protection Regulation (GDPR) lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.</p>
<b>Personal data</b>	<p>'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p>
<b>Personal identifiers</b>	<p>A set of basic personal details that allow partner organisations to identify a data subject.</p>
<b>Personal information</b>	<p>Includes information falling within the definition of 'personal data' and information about deceased individuals. Data protection legislation does not apply to information about deceased individuals but such information needs to be treated confidentially and WASPI should be applied to this information.</p>
<b>Practitioner</b>	<p>An inclusive term that refers to those involved in the care, education, welfare of data subjects; ie those who provide a public service.</p>

<p><b>Processing personal data</b></p>	<p>'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.' (GDPR Art 4(2))</p>
<p><b>Special categories of data / sensitive data</b></p>	<p>Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. (GDPR Art 9(1))</p> <p>Personal information relating to criminal convictions and offences or related security measures (GDPR Art 10).</p>

**10 Appendix B – Information Reference Table for the sharing of personal information to support the provision of Tenancy Management to allow for formal action for breaches of tenancy**

This table sets out the why, what, when and how of information sharing in detail. Guidance on completing this section can be found here

	Description	Request for information	Response to request for information	Proactive disclosure following positive warrant
1	<p><b>Information exchange</b></p> <p><i>General description of the process or stage to which the information sharing relates.</i></p>	<p>Partner agency contacts DPP and provides basic personal info of individuals and property address about which further info is req'd (Stating what info is req'd and reason. If info from more than 9 months ago is req'd, a justifiable reason is needed.)</p>	<p>DPP subsequently sharing relevant information with the requesting agency in response to their request.</p>	<p>When a positive warrant has been executed by Dyfed Powys Police, the address details and date of warrant execution will be shared with the Local Authority or Housing Association.</p>

	Description	Request for information	Response to request for information	Proactive disclosure following positive warrant
2	<p><b>What information will be shared?</b></p> <p><i>Describe the information to be shared – you do not need to go to ‘field level’ detail.</i></p> <p><b><u>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</u></b></p>	<p>Partner agency contacting DPP will provide personal identifiable information to include Surname, Forename, DoB, Address inc post code, length at address.</p> <p>When seeking information the partner agency will provide a rationale identifying what information they are seeking and the reason the information is sought.</p> <p>Such requests will provide reference to the specific part of the tenancy agreement relevant to the request.</p>	<p>A summary of relevant information contained within Dyfed Powys Police systems over the preceding nine months. This period may be extended where justifiable reasons have been provided by the requesting party</p>	<p>A summary of relevant information contained within Dyfed Powys Police systems over the preceding nine months. This period may be extended where justifiable reasons have been provided by the requesting party</p>

3 Partner Organisation(s)	Who by	Who to	Who by	Who to	Who by	Who to
<p><i>Details of provider and recipient organisation(s)</i></p> <p><i>Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</i></p>	<p>2. Carmarthenshire County Council</p> <p>3. Pembrokeshire County Council</p> <p>4. Ceredigion County Council</p> <p>5. Powys County Council</p> <p>6. Newydd Housing Association</p> <p>7. Barcud Housing Association</p> <p>8. Grwp Cynefin</p> <p>9. Bro Myrddin Housing Association</p> <p>10. Family Housing Association Wales</p> <p>11. Ateb Group</p> <p>12. Wales and West Housing Association</p> <p>13. Melin Homes</p> <p>14. Pobl Housing Association</p> <p>15. Clwyd Alyn Housing Association</p> <p>16. Ty Glas Housing Association</p>	<p>1. Dyfed Powys Police</p>	<p>2. Carmarthenshire County Council</p> <p>3. Pembrokeshire County Council</p> <p>4. Ceredigion County Council</p> <p>5. Powys County Council</p> <p>6. Newydd Housing Association</p> <p>7. Barcud Housing Association</p> <p>8. Grwp Cynefin</p> <p>9. Bro Myrddin Housing Association</p> <p>10. Family Housing Association Wales</p> <p>11. Ateb Group</p> <p>12. Wales and West Housing Association</p> <p>13. Melin Homes</p> <p>14. Pobl Housing Association</p> <p>15. Clwyd Alyn Housing Association</p> <p>16. Ty Glas Housing Association</p>	<p>1. Dyfed Powys Police</p>	<p>2. Carmarthenshire County Council</p> <p>3. Pembrokeshire County Council</p> <p>4. Ceredigion County Council</p> <p>5. Powys County Council</p> <p>6. Newydd Housing Association</p> <p>7. Barcud Housing Association</p> <p>8. Grwp Cynefin</p> <p>9. Bro Myrddin Housing Association</p> <p>10. Family Housing Association Wales</p> <p>11. Ateb Group</p> <p>12. Wales and West Housing Association</p> <p>13. Melin Homes</p> <p>14. Pobl Housing Association</p> <p>15. Clwyd Alyn Housing Association</p> <p>16. Ty Glas Housing Association</p>	<p>1. Dyfed Powys Police</p>

4	<p><b>What safeguards are in place to protect the information referred to in row 2, above?</b></p> <p><i>Provide, in detail the specific agreed secure methods for sharing personal information</i></p>	<p>CJSM/TLS v1.2 (or higher) or Varonis secure e mail.</p> <p>Office 365 may be used in future if deemed secure.</p> <p>Royal mail special delivery tracked/signed for</p> <p>ONLY SECURE TRANSFERS WILL BE CONSIDERED.</p>	<p>CJSM/TLS v1.2 (or higher) or Varonis secure e mail.</p> <p>Office 365 may be used in future if deemed secure.</p> <p>Royal mail special delivery tracked/signed for</p> <p>ONLY SECURE TRANSFERS WILL BE CONSIDERED</p>	<p>CJSM/TLS v1.2 (or higher) or Varonis secure e mail.</p> <p>Office 365 may be used in future if deemed secure.</p> <p>Royal mail special delivery tracked/signed for</p> <p>ONLY SECURE TRANSFERS WILL BE CONSIDERED</p>
5	<p><b>Reliance on consent</b></p> <p><i>Check the box if any exchange relies on consent and explain how and when consent is obtained. Ensure section 4 of the ISP reflects this legal basis</i></p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p>
6	<p><b>Notes for Practitioners</b></p>			