

Architecting the GDPR Ready Enterprise

Adrian Leung

Head of Information Security, Catalyst Housing
Chair, Housing Security & Privacy Forum

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Secure information **Secure Catalyst**



Agenda

1. GDPR overview
 2. Challenges
 3. Where to start
 4. A case study
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INSIDEHOUSING

Development Finance Fire safety Housing Management Technology Policy

VIEW ALL

HCA in information security breach

NEWS 13/10/17 BY LUKE BARRATT

The Homes and Communities Agency (HCA) has reported itself to the Information Commissioner's Office (ICO) after accidentally revealing the email addresses of some housing association staff.

A close-up photograph of a silver metal padlock resting on a complex, golden-brown printed circuit board (PCB). The padlock is closed, and its shackle is visible. The background is filled with the intricate patterns of the circuit board, including various traces, pads, and components, creating a high-tech, digital aesthetic.

Picture: Getty

Sharelines

► HCA in information security breach #ukhousing

The HCA sent an email to 508 housing associations that unintentionally made visible the addresses of other recipients.

In a statement, it said: "While the information disclosed was not sensitive, we are taking this breach very seriously and apologise unreservedly.

"This incident should not have happened and we are committed to acting transparently with all relevant parties. We are in the process of contacting all of the providers affected by the breach and we are taking urgent steps to ensure this never happens again."

GDPR Overview

Background

General Data Protection Regulation (GDPR)

- Comes into force on the 25th May 2018 in the UK (even with Brexit)
 - Data Protection Bill introduced to House of Lords on 13th Sep 2017
 - Second reading in House of commons on 5th Mar 2018
- Applies to organisations processing personal data
- Enhanced rights for consumers and citizens
- Increased obligations on organisations
- More powers for regulators



Elizabeth Denham
Information Commissioner

Your rights

Putting consumers and citizens first

1. The right to **be informed** about how information is processed (*Articles 12 to 14*)
2. The right to **access** your information (*Article 15*)
3. The right to **rectification** of incorrect or outdated information (*Article 16*)
4. The right to **be forgotten** (*Article 17*)
5. The right to **restrict** how your information is processed (*Article 18*)
6. The right to **data portability** (*Article 20*)
7. The right to **object** to having your data processed (*Article 21*)
8. The right to see how **automated decisions** are made (*Article 22*)
9. The right to **withdraw consent** for processing (*Article 7(3)*)



Privacy principles

Putting consumers and citizens first (Article 5)

1. Lawfulness, fairness and transparency
2. Purpose limitation -> tenancy administration
3. Adequacy and relevancy (data minimisation)
4. Accuracy and up-to-date
5. Storage limitation -> shortlisting information
6. Security (confidentiality & integrity)
7. Accountability

Learn About CORE

PAPER LOGS FOR INTERNAL USE ONLY. ALL DATA MUST BE SUBMITTED ONLINE

CORE Lettings Log 2017/18

Is this an Affordable Rent, Social Rent or Rent To Buy Letting Log? AR ☐ Social ☐ Rent To Buy ☐

1. Key Dates (e.g. 12/05/17) Day Month Year
DO NOT LEAVE BLANK

LANDLORD / LETTINGS DETAILS
1a. Type of Letting
Private Registered Provider (HA) Landlord
OR
Local Authority landlord:
Letting in < General Needs unit ☐ 1 5 9
Supported unit ☐ 2 6 10
OR
Letting in < General Needs unit ☐ 3 7
Supported unit ☐ 4 8

FOR GENERAL NEEDS HOUSING ONLY
1b. Who is the landlord on the tenancy agreement?
This landlord ☐ 1 Another RP (HA/LA) ☐ 2
If another RP (HA/LA) CORE code
Name

FOR SUPPORTED HOUSING ONLY
1c. Please enter the management group and scheme code for the property
Management group code Scheme code
1d. Is this the first letting in a supported housing unit / bed space which has been newly built, converted or newly acquired?
Yes ☐ 1 No ☐ 2

TENANCY DETAILS
2a. Is this a starter / introductory tenancy? Yes ☐ 1 No ☐ 2
2b. Type of main tenancy (after any starter/introductory period)
Secure (inc flexible) ☐ 1 Licence agreement (supported housing/almshouses only) ☐ 5
Assured ☐ 2 Other ☐ 3
Assured shorthold ☐ 4 Tenant Code
2c. If the main tenancy is a fixed term tenancy, please provide the length of the fixed term (to the nearest year) excluding any starter/introductory period
Years

HOUSEHOLD DETAILS
3. HOUSEHOLD CHARACTERISTICS. Enter all demographic details required for person 1. For all other household members enter age, sex, relationship to person 1 and economic status. If joint tenancy, enter most economically active tenant first.
Person 1 Age Sex Relationship to person 1 Economic status Ethnicity Nationality
Person 2 Age Sex Relationship to person 1 Economic status Ethnicity Nationality
PLEASE ENTER RELEVANT CODE PLEASE REFER TO

4ai) Has anyone in the household ever served in the UK Armed Forces as a regular or a reserve? (Excluding National Service)
Yes - regular ☐ 1 Yes - reserve ☐ 4 No ☐ 2 Refused ☐ 3
ii) If they've ever served as a regular, have they left within the last five years?
Yes ☐ 1 No ☐ 2 Refused ☐ 3
4b. Has anyone in the household been seriously injured or ill as a direct result of their time and activities serving as a regular or a reserve?
Yes ☐ 1 No ☐ 2 Refused ☐ 3
5. Does the household contain a pregnant woman?
Yes ☐ 1 No ☐ 2 Refused ☐ 3
6. Is tenant in receipt or likely to be in receipt of the following: (one only)
Housing Benefit (Not in receipt of UC) ☐ 1
Not in receipt of UC or HB ☐ 9
UC - with housing element (and not in receipt of Housing Benefit) ☐ 6
UC - without housing element (not in receipt of HB and tenants not eligible for housing support, e.g. residential care home) ☐ 7
UC - without housing element (and in receipt of HB) ☐ 8
7. How much of your income comes from universal credit, state pensions or benefits (excluding child & housing benefit, council tax support or tax credit)?
All ☐ 1 Some ☐ 2 None ☐ 3 Don't Know ☐ 4
8. Tenant's or tenant and partner's net weekly income (after tax deductions)
For those receiving Universal Credit, enter net weekly income from employment, pensions and Universal Credit. Exclude child benefit and council tax support.
For those not receiving Universal Credit, enter net weekly income from employment, pensions and other benefits. Exclude housing benefit, child benefit and council tax support.
Please check if Q8 refused ☐ Round to nearest £
9a. In the tenant's view what was the main reason the household left their last settled home?
Under occupation - offered incentive to downsize ☐ 29
Under occupation - no incentive ☐ 30
Property unsuitable because of ill health / disability ☐ 13
Property unsuitable because of poor condition ☐ 14
Domestic abuse ☐ 7 Couldn't afford fees attached to renewing the tenancy ☐ 35
(Non-violent) relationship breakdown with partner ☐ 8 Couldn't afford the increase in rent ☐ 36
Asked to leave by family or friends ☐ 9 Couldn't afford rent or mortgage - welfare reforms ☐ 37
Racial harassment ☐ 10 Couldn't afford rent or mortgage - employment ☐ 38
Other problems with neighbours ☐ 11 Couldn't afford rent or mortgage - other ☐ 39
Property unsuitable because of overcrowding ☐ 12 To move nearer to family / friends / school ☐ 16
End of Assured shorthold tenancy or Fixed Term tenancy - on a 'no fault' basis ☐ 32 To move nearer to work ☐ 17
End of Assured shorthold tenancy or Fixed Term tenancy - eviction; tenant at fault ☐ 33 To move to accommodation with support ☐ 18
Repossession ☐ 34 To move to independent accommodation ☐ 19
Other ☐ 20 Hate crime ☐ 31
Don't know ☐ 28
9b. Was the reason for leaving a direct result of the removal of the spare room subsidy or benefit cap introduced from 2013? (this is most likely to apply if options 1, 29, 30, 33, 34 or 37 were selected for 9a)

*Explicit consent is required for
data processing*



Legal basis

When can I process personal data (*Article 6*)

1. Consent
2. Performance of contract
3. Comply with legal obligation
4. Protect the vital interest of data subject
5. Public interest
6. Legitimate interests of the controller

Some Challenges

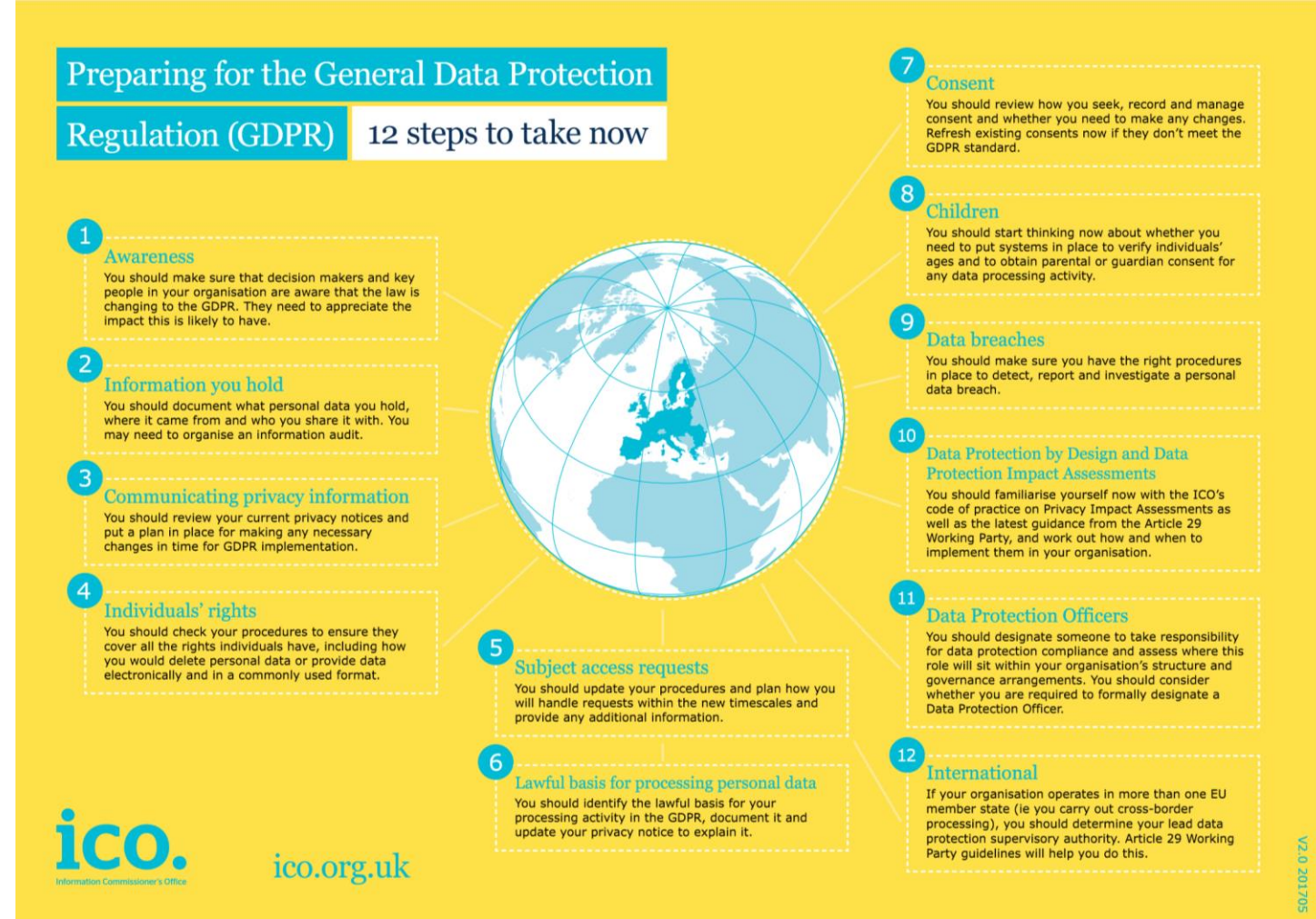
Why compliance is difficult

1. Principles based legislation (c.f building regulations)
2. Senior Management
 - a. Understanding
 - b. Buy-in (what is the minimum)
3. Not compliant with DPA 1998
4. Competing (and conflicting) priorities
5. Data quality
6. Requires involvement from across the business
7. Skills and expertise
8. Noise

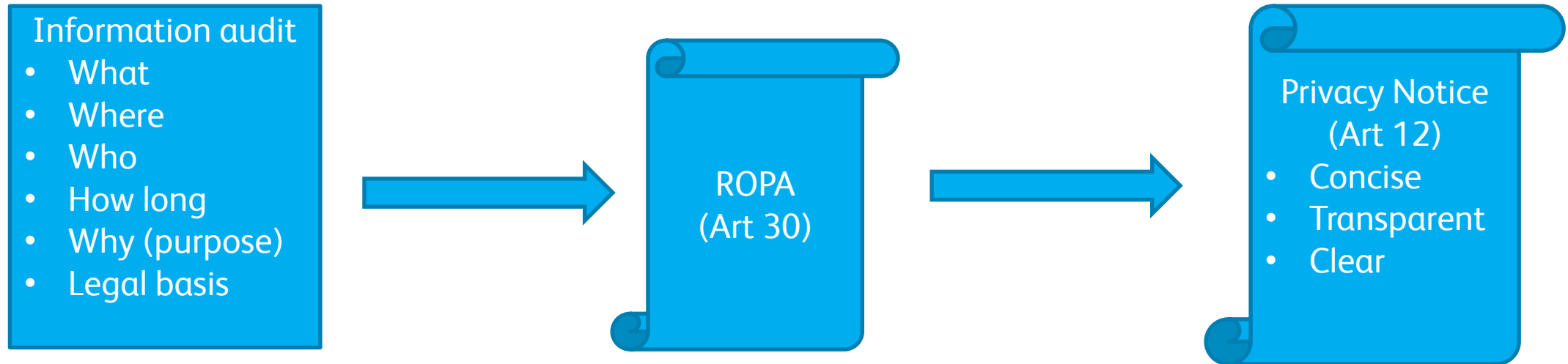
Where to start

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1. Training and awareness
2. Information audit
3. Privacy Notice
4. Record of Processing Activity
5. Subject Access Requests (SARs)
6. Cybersecurity
7. Privacy Impact Assessments
8. DPOs
9. Supplier assurance
10. Developing your BAU Privacy capability

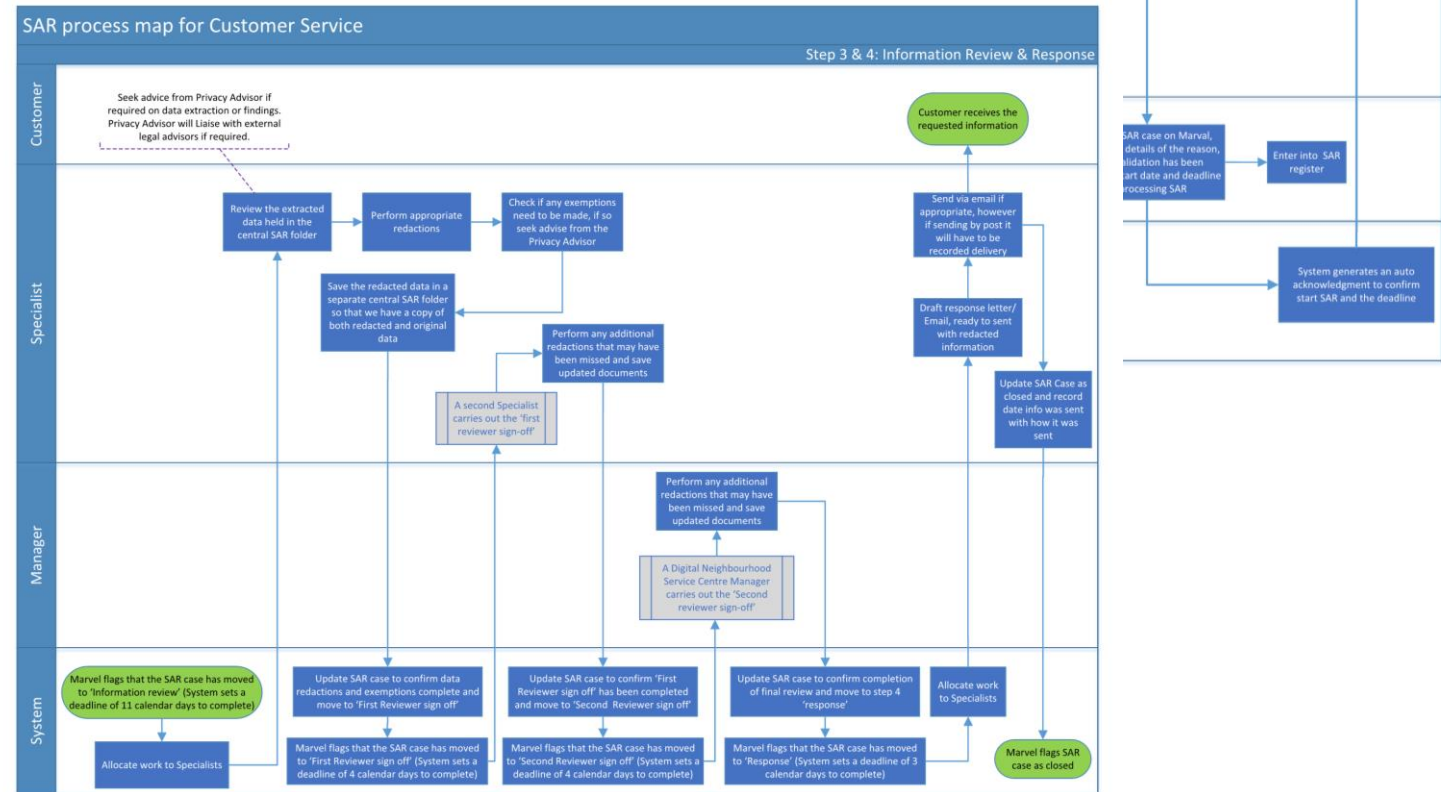
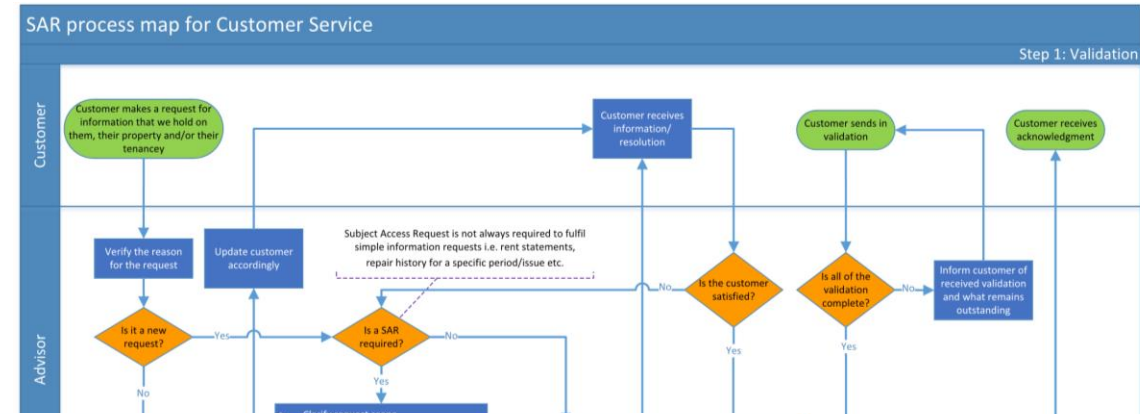


Where to start



Subject access requests

1. Customer and Employee
2. SAR Process
 - a. Validation
 - b. Information extraction
 - c. Review
 - d. Response



Vendor: Is GDPR on your agenda? Our solution will help you become GDPR compliant.

Recruiter: I am representing a candidate with 15 years GDPR experience.



What does GDPR say about Cybersecurity?

Article 32

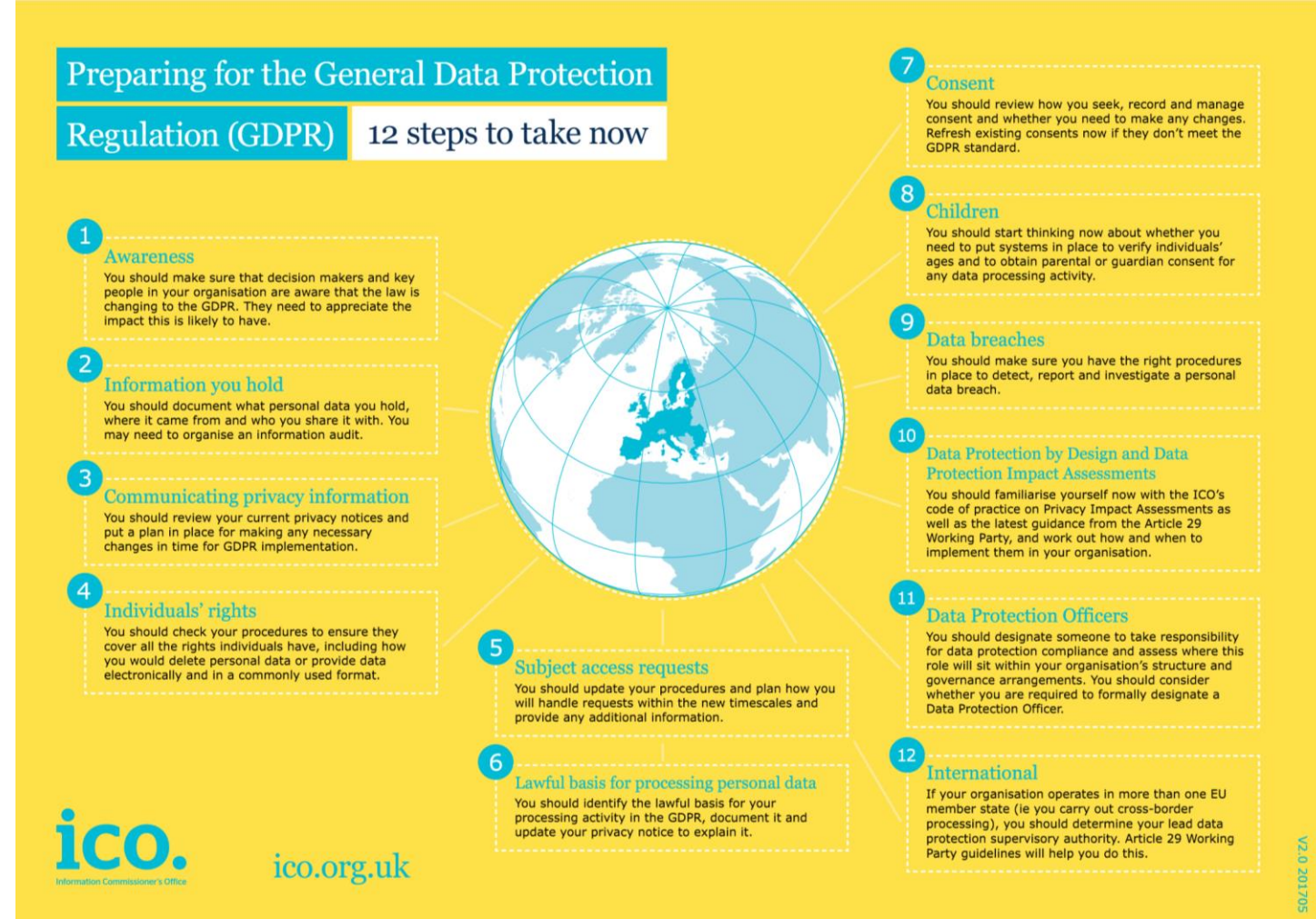
1. “Taking into account the state of the art, the costs of implementation..., purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller...shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk...:
 - a. Pseudonymisation and encryption
 - b. ...Confidentiality, integrity and availability
 - d. Regular testing, assessing and evaluating the effectiveness...



Elizabeth Denham
Information Commissioner

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Case study

We need to encrypt everything



Case study

Employee Survey

First name	Surname	Email	Payroll No	Directorate	Team	Mgr Name	DOB	Start Date	Gender	Salary

Housing Security & Privacy Forum

Aims of the Forum

- Share and exchange knowledge and good practice
- Discuss common challenges
- Keep abreast of developments in sector
- Collaborate & pool resources -> Value for Money
- Develop guidance and standards
- Raise maturity level in sector

Thank you!



Contact us

Email: Adrian.Leung@chg.org.uk

LinkedIn: <https://www.linkedin.com/in/adrianleung1>