



TOLLCROSS
housing association

Homeworking Policy

Prepared By	Anne Fitzsimons, Corporate Services Director
Policy Created	April 2020
Date of Last Review	//
Date of Current Review	21 st April 2020
Date of Next Review	April 2024
Reviewed By	Management Committee

CORPORATE FIT	
Internal Management Plan	✓
Risk Register	✓
Business Plan	✓
Regulatory Standards	✓
Equalities Strategy	✓
Legislation	✓

On request, the Association can provide translations of all our documents, policies and procedures in various languages and other formats such as computer disc, tape, large print, Braille etc. and these can be obtained by contacting the Association's offices.

1. Purpose of this Document

This document defines acceptable policy for users whilst using “*their own*” devices, systems and applications, for accessing, viewing, modifying and deleting Association held data and accessing its systems if their role requires them to access held data whilst away from the office, i.e. in remote offices or their home.

It also sets out acceptable policy to comply with Data Protection Act 2018 / GDPR 2018, for users for accessing, viewing, modifying and deleting Tollcross Housing Association’s data and accessing its systems if your role requires you to access Tollcross Housing Association’s data whilst away from the office, i.e. in remote offices or your home.

2. Definitions

Data Protection Law means the General Data Protection Regulation (EU) 2016/679 ("GDPR"); the UK Data Protection Act 2018; the EU Directive 2002/58/EC on privacy and electronic communications (PECR), as is applicable in the UK; and any laws replacing, amending or supplementing the same and any other applicable data protection or privacy laws.

Remote equipment / Home Worker refers to users using either equipment provided by the Association or your own device or systems or applications, to access and store Association information, at your home or remotely, typically connecting to Tollcross Housing Association’s servers via VPN, but also various Cloud based applications.

IT Team – The Finance Director, IT consultant and internally identified IT Champions.

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. Tollcross Housing Association is the Data Controller for its employee’s personal data and tenant/owner personal data.

User – A member of staff, employee, contractor, visitor, or another person authorised to access and use Tollcross Housing Association’s systems.

Data Processor – a person, group or organisation that processes personal data on the instructions of a Data Controller set out in a written contract.

3. Policy Introduction

3.1 This policy covers the use of electronic devices which could be used to access Tollcross 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.

Tollcross 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 processed. As an employee of Tollcross Housing Association you are

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

Tollcross 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.

It is the Association's intention to place as few technical and policy restrictions as possible on the home working policy, subject to the Association meeting its legal and duty of care obligations.

4. Approval for Working Remotely

Line Managers will consider requests for home working in consultation with individual members of staff and may wish to confirm such arrangements with their Director and the Corporate Services Director.

5. Data Protection, Security and Confidentiality of Materials

5.1 You must follow Tollcross 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 Tollcross Housing Association with evidence you are complying with these principles.
- b) Never leave a computer with personal confidential information 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, e.g. retain hard copies in a locked drawer/cabinet and lock your computer screen when away from it.
- g) You should only work within Tollcross Housing Association's approved systems.
- h) Do not hold person identifiable information on personal electronic devices. If you absolutely have to 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 Tollcross Housing Association's documents to your personal account in these applications. You should disable these uploads whilst you are doing Tollcross Housing Association work.
- j) Any paper taken from the office to work at home must be protected in transit and in your home, e.g. in a wallet or case.
- k) Paper files should be 'signed out' from the office and 'signed in' again when returned.
- l) IT kit should be 'signed out' from the office and 'signed in' again when returned.
- m) Keep paperwork secure at home and out of sight of members of your family and others.

6. Safety

- 6.1 Staff who work at home have individual responsibilities under Health and Safety regulations. They are required to take reasonable care of their own health and safety and to cooperate with the Association as necessary to comply with statutory obligations, for example, by allowing one of the Association's Managers to examine any equipment supplied by the Association or to visit the home.
- 6.2 A health and safety assessment will be carried out according to Tollcross Housing Association's health and safety checklist (Appendix 1), which covers DSE risks and general precautions for householder electrical safety. Domestic electrical supply configurations are outwith the control of the employer and are the responsibility of the staff member as home-owner/tenant. Staff will be asked to perform their own assessment and results will then be validated by their line manager during a discussion or home visit.

The employees will be expected to report any changes that may affect the arrangements in the future (in which case another assessment may be necessary).

- 6.3 It is important that regular breaks are introduced to your daily routine, including your lunch break. Please ensure you do this and in particular take a break away from working at your workstation at least every hour. Your mental well-being is also important, so should you feel you are experiencing any difficulties with this, please notify your Line Manager. In the meantime, please see below some agencies you can also access for assistance:

www.rowan-consultancy.co.uk (self-referral counselling sessions supported by the Association)
www.mind.org.uk
www.mentalhealth.org.uk
www.lltff.com/wp-content/uploads/LLTFF-Coronavirus-for-adults-at-home.pdf
www.nhs.uk/oneyou/every-mind-matters

- 6.4 Report any accidents or incidents in the home relating to home working (Appendix 2 of the Homeworking Policy).

7. Recording the days of working from home

A record must be kept of all days worked from home, and where access to the time management system is not available, all staff will agree with their Line Manager how to record this information.

8. Communication during days of working from home

Prior to commencing any period of working from home, your Line Manager will agree with you how and when you shall maintain contact, e.g. telephone, text, e-mail and frequency. This will be clarified in writing between you.

9. Equalities

- 9.1 An Equality Impact Assessment (EIA) has been carried out when reviewing this new policy. In line with good practice the completed EIA will be published alongside the Homeworking Policy.
- 9.2 Where there is a need for follow-up action, the tasks and timeframe for achieving them shall be noted in the Equality and Human Rights Action Plan to ensure they are addressed.
- 9.3 We do not see this policy as having any direct impact upon the protected characteristics contained within the Equality Act 2010.

10. Insurance Arrangements

All members of staff must contact their mortgage lenders, insurers or landlords to confirm there are no restrictions on home working. Failure to inform domestic insurers may result in home insurance cover rendered invalid. The Association must also confirm that any IT equipment to be used at home is covered by insurance arrangements.

11. Loss or Theft

11.1 In the event that your device is lost or stolen, or its security is compromised, you **MUST** promptly report this to the Finance Director (or a member of the IT team), in order that they can assist you to change the password to all Association services (it is also recommended that you do this for any other services that have accessed via that device, e.g. social networking sites, online banks, online shops). You must also cooperate with the IT Team in wiping the device remotely, even if such a wipe results in the loss of your own data, such as photos, contacts and music.

11.2 The Association will not monitor the content of your personal devices however the IT Team reserves the right to monitor and log data traffic transferred between your device and Association systems, both over internal networks and entering the Association via the Internet.

11.3 In exceptional circumstances, for instance where the only copy of an Association document resides on a personal device, or where the 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) the Association will require access to Association data and information stored on your personal device. Under these circumstances, all reasonable efforts will be made to ensure that the Association does not access your private information.

12. 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 the Association's disciplinary procedure.

13. Policy Review

We will review and update this Homeworking Policy at least every 4 years or earlier, if required by changes in legislation.

Appendix 1
Tollcross Housing Association
Health & Safety Checklist for employees working from home

This list is not exhaustive and has been used in conjunction with section 3.20 of the Health and Safety Manual.

Electrical Equipment

The safety and maintenance of the domestic electrical supply/installation is the responsibility of the house-holder. Tollcross Housing Association will only take maintenance responsibility for any equipment it directly supplies. These items will be PAT tested prior to issue.

Householder checklist:

- Complete the attached Display Screen Equipment (DSE) Risk Assessment
- Ensure electrical equipment is turned off when not in use and before performing any checks
- Check plugs are not damaged
- Check domestic electrical supply is suitable for the equipment in use
- Check plugs are properly wired and that the outer cable covering is gripped at the point it enters the plug or equipment.
- Check outer covers of equipment are sound and have no loose parts or missing screws
- Check all leads and cables routinely against damage to the outer covers
- Check for burn marks or other signs of overheating
- Repair any electrical equipment with potential to harm
- Check and secure all trailing wires – the best way is to use power outlets nearest to the equipment. Where this is not possible tuck trailing wires securely under desks etc. and out of normal walkways
- Do not have young children unsupervised in any area where you are using electrical equipment

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DSE Risk Assessment



Note: This Assessment may be used by a Competent Person to assess the risks associated with each DSE User's working practices or by the DSE User as an initial 'Self-Assessment', followed by review by a Competent Person where problem areas or uncertainties are identified.

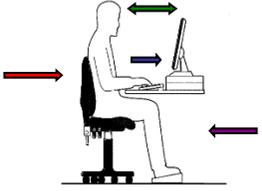
STAGE 1 – ASSESSMENT DETAILS			
Name of DSE user		Date of self-assessment	
Location of workstation		Desktop or laptop?	
Name of assessor		Date of assessment	
Signature of assessor		Review date	

STAGE 2 – DSE ACTIVITIES
Provide a summary of DSE activities – e.g. type of use; number of hours used each day, length of continuous use, etc.

STAGE 3 – PHOTOGRAPHS OF WORKSTATION (at time of Assessment)	

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DSE Risk Assessment

STAGE 4 – ASSESSMENT AND ACTION PLAN						
Nº	Question		Self-Assessment – to be completed by the DSE User	Competent Person Assessment – comments (including actions taken)	Further Actions Required	Actions Completed (person and date)
1	a) Can you adjust your seat?		Back height?			
			Back tilt?			
			Seat height?			
	b) Does your seat have wheels / glides?					
2	Is your chair adjusted as follows:		The small of your back supported?			
			Forearms horizontal?			
			Eyes level with the top of the screen?			
	Feet flat on the floor without too much pressure from the seat on the backs of the legs?					
3	Do you have enough room under your desk to move your legs and change position?					
4	Do you feel any pain, discomfort or stiffness in your neck, shoulders, arms or hand(s) during or after using IT equipment?					
5	Have you have felt any of the above when working with IT equipment in the past (e.g. at another workstation or during previous employment)?					
6	Do you / have you had any health problems that could affect your work with IT equipment? (For example: epilepsy, back problems, poor circulation)					

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DSE Risk Assessment

STAGE 4 – ASSESSMENT AND ACTION PLAN						
Nº	Question		Self-Assessment – to be completed by the DSE User	Competent Person Assessment – comments (including actions taken)	Further Actions Required	Actions Completed (person and date)
7	Are the words on your screen clear, easy and comfortable to read?					
8	Is the image on the screen stable and flicker- free?					
9	Can you adjust the brightness and / or contrast?					
10	Does your screen		Swivel?			
			Tilt?			
11	Are there any reflections on the screen? (For example from windows or lights)					
12	Is the keyboard separate from the screen?					
13	Can you tilt the keyboard?					
14	Can you easily read the letters, numbers and symbols on the keyboard?					
15	Do you have a comfortable keying position?					
16	Is the mouse suitable for your needs?					
17	When using a mouse do you: a) Keep it close to the keyboard?					

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DSE Risk Assessment

STAGE 4 – ASSESSMENT AND ACTION PLAN					
Nº	Question	Self-Assessment – to be completed by the DSE User	Competent Person Assessment – comments (including actions taken)	Further Actions Required	Actions Completed (person and date)
	b) Have a straight wrist and relaxed hand?				
	c) Take your hand off the mouse when you are not using it, i.e. type using both hands?				
	d) Support your wrist and forearm while using the mouse?				
18	Does the mouse work smoothly at a speed that suits you?				
19	Is the software you use suitable and can you use it comfortably?				
20	Is your work surface large enough to place all your equipment where you want it?				
21	Is the height of your desk suitable?				
22	Can your desk height be adjusted if necessary?				
23	Can you comfortably reach and use the equipment / papers etc. on your desk?				
24	Are your work surfaces free from reflections? (For example from windows or lights)				
25	How long do you work at a computer before taking a break?				
26	How often do you have an eyesight test?				

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DSE Risk Assessment

STAGE 4 – ASSESSMENT AND ACTION PLAN					
Nº	Question	Self-Assessment – to be completed by the DSE User	Competent Person Assessment – comments (including actions taken)	Further Actions Required	Actions Completed (person and date)
27	When was your last eyesight test?				
28	Do you wear glasses only when you are working with IT equipment?				
29	Do you feel that the lighting levels are suitable?				
30	Do you have comfortable levels of ventilation?				
31	Is the workplace at a comfortable temperature?				
32	Are there comfortable noise levels in the workplace?				
33	Do you have any other concerns or comments regarding your workstation or DSE use?				

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DSE Risk Assessment



34	Have you received adequate information, instruction and training on DSE use, hazards, risks, control measures, reporting faults and injuries and in the use of hardware and software?				
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Comments: Please summarise any changes you've made to this form and put name and date in this box.

Appendix 2 of Homeworking Policy

Introduction

When an accident or incident occurs, the Health & Safety Administrator (H&SA) must be informed by the person reporting the event. There are two ways to record an event - the accident book or an incident report sheet. Analysis is undertaken by the H&SA to identify trends and redress as necessary. The outcome of this analysis will be reported to the H&S Board in the first instance and then to Management Committee as appropriate.

After receiving notification of an event the H&SA shall complete section 1 of this form and pass to the appropriate Line Manager for investigation. The Line Manager shall carry out an investigation and complete Section 2. They should then complete Section 3 and return report to the H&SA as soon as possible.

Section 1

Date of incident		Date reported to H&SA	
Location of event		Nature of event	
Name of Investigating Officer		Date passed to Investigating Officer	

Section 2

Date of investigation	
Cause of Event (to be completed after Line Manger has investigated event)	

Is further action required Yes/No

What Action is necessary	By Whom	By When

Section 3

Date form returned to HS&A	
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