

SWANSEA HOUSING AUTHORITY

PRIVACY POLICY

I. PURPOSE:

The Swansea Housing Authority collects and disseminates a great deal of personal information about individuals. Records are maintained on employees of the agency, persons doing business with the agency and persons serviced by the agency, including applicants, tenants, and landlords. The right to privacy is a personal and fundamental right protected by the Constitution of the United States. To the best of its' ability, the Swansea Housing Authority shall provide safeguards for an individual against an invasion of his privacy. Records will be maintained with appropriate administrative, technical and physical safeguards to ensure the security and confidentiality of records. They shall be protected against any anticipated threats or hazards to their security or integrity which could result in substantial harm, embarrassment, inconvenience or unfairness to any individual on whom information is maintained. In order to safeguard the privacy of individuals from possible infringement, either willful or accidental, we have developed this policy in compliance with 760 CMR 8.00 and the Privacy Act of 1974.

II. DESIGNEE:

The Swansea Housing Authority designates the Managing Agent as the officer immediately responsible for the privacy, confidentiality, and security of personal data consistent with M.G.L. c.66A.

III. PERSONAL DATA GUIDELINES:

- A. The Swansea Housing Authority shall not collect or maintain more personal data than reasonably necessary for the performance of it's legally authorized functions.
- B. An individual must be allowed to prevent records pertaining to them, which were collected for a specific purpose, to be made available for another purpose without their consent.
- C. An individual must be allowed access to information pertaining to them in agency records and to have a copy made of all or any part of that information.
- D. An individual must be given the right to seek correction or amendment of any agency record pertaining to them.

E. The Swansea Housing Authority may not collect, maintain, use or disseminate any record identifying personal information unless it is for a necessary and lawful purpose.

F. Swansea Housing Authority must assure that any information it does collect, maintain, use or disseminate is current and accurate for its intended use, and that adequate safeguards exist to prevent misuse of information.

G. Swansea Housing Authority employees should exercise sound judgment in deciding what constitutes sensitive information. Such information such as name, address, status, disposition, arrest record, date of birth, social security number, medical records, financial status, and similar information would be considered, sensitive.

H. In each tenant/resident file, the housing authority will maintain a list of the persons, agencies, or entities (other than authorized housing authority employees) which have gained access to the file.

I. These guidelines apply to all records, automated and manual.

IV. MANUAL RECORDS:

Manual records should be maintained subject to the following minimum safeguards:

A. During working hours, the area in which the records are maintained, or regularly used, should be carefully monitored by authorized personnel.

B. Care should be taken to ensure that sensitive information in files or on desktops not be visible to unauthorized personnel.

C. During non-working hours, access to the records should be restricted by their storage in locked file cabinets or a locked room.

E. When a tenant/applicant file is being viewed by an authorized person who is not an employee of the housing authority, the person must sign in on the sheet provided in the file.

F. At no time will a person who is not a housing authority employee be able to view, handle, or copy anything in the file without an employee present. When copying is being done, the custody of the file must remain with the housing authority employee.

V. COMPUTERIZED RECORDS:

Computerized records should be maintained subject to the following minimum safeguards:

A. During working hours, computer monitors in which records are maintained or regularly used should have timed screen savers or password requirements to access the records.

B. During non-working hours, all computer systems will be shut down to original sign-on screen.

C. Care will be taken to ensure that sensitive information not be visible on the computer screen to unauthorized personnel.

VI. COPYING OF RECORDS:

If an individual requests a copy of their record, for personal or legal reasons, the individual requesting the copy may be asked to put their request in writing and may be asked to sign a receipt for the copies. Said receipt will be maintained at the housing authority. If the individual's request will require a substantial amount of staff time, the individual will be informed of when the copies will be ready to be picked up or mailed. One copy will be provided at no expense to the individual. More than one copy, or copies of information that has already been provided to the individual once, will be done for the standard fee currently being charged by the Swansea Housing Authority for copying.

VII. RELEASE OF INFORMATION IN FILE:

To insure that no personal information is released to any substitute, proxy, or representative (legal or otherwise) for the tenant/applicant that is not duly authorized to receive it, the housing authority will require that a signed release of information be on file with the housing authority before speaking with or providing written information to anyone other than the tenant/applicant. The signed release must contain the tenant/applicant's printed name, signed name, and control # (if an applicant). The housing authority, at its discretion, may require other identifying information as well (i.e. birth date, social security number). All signed releases must be dated within the past 12 months.

VII. DESTRUCTION OF RECORDS:

The destruction of records will be sufficient to prevent the association of any individual name or identified with any information pertaining to that individual. The Swansea Housing Authority's acceptable method of destruction is shredding.

IX. EMPLOYEE REFERENCES:

Requests for employee references and employment record information will only be provided to a third-party when the employee has given authorization to the Managing Agent to release the information.

