


A Guide to Data Security



Background and the need for learning

Credit unions are not immune from the constant technological changes taking place in the world. Our members are exposed to constant technological changes in their lives. Inevitably this means the threat of computer misuse and cyber crime increases with every change. Our  aim is to remain appropriately equipped and aware for our times.

Uniquely credit unions are probably the only licenced financial services providers that encourage volunteers to work alongside employees. Therefore we must ensure training and information is provided to **all**.

Learning Outcomes


Understanding the appropriate use of the credit union:

- a. Computer systems
- b. Personal data
- c. Data protection
- d. Internet
- e. Emails
- f. Confidentiality
- g. Data sticks
- h. Unauthorised software

People from all backgrounds and ability will be using this training be patient if you already know some of this material

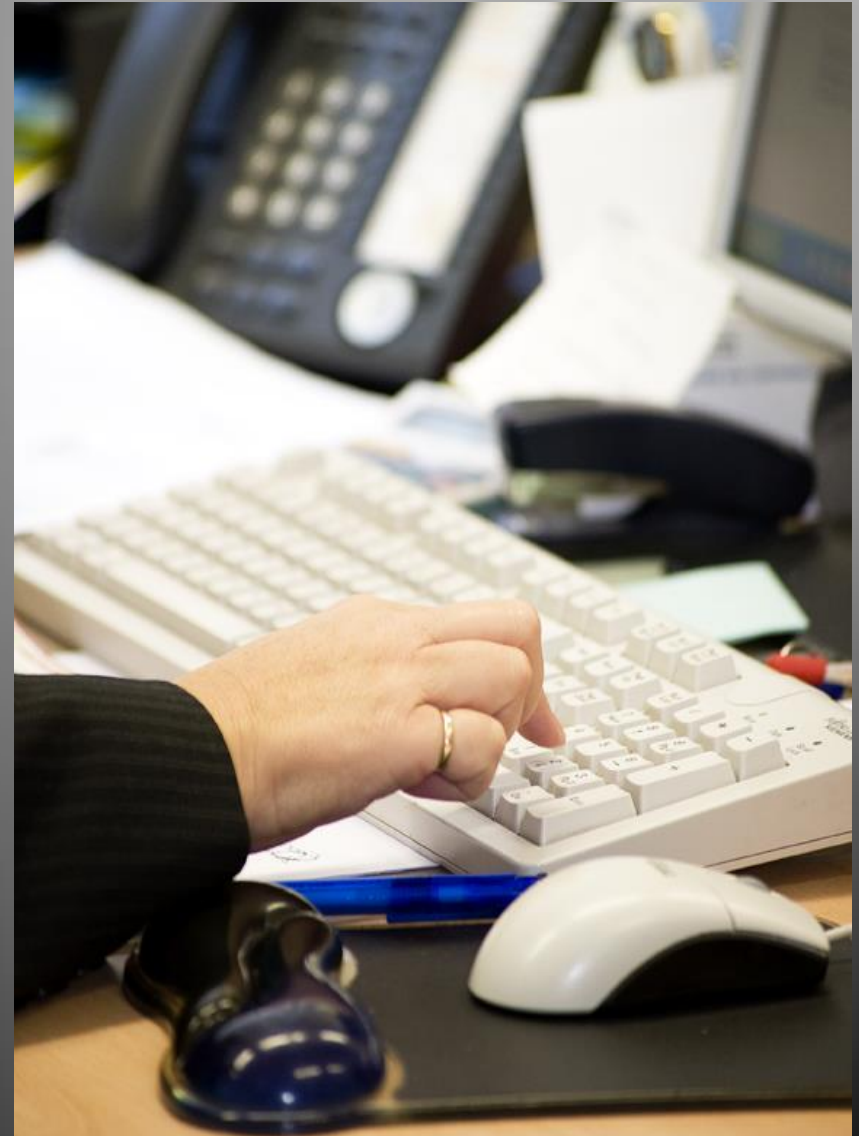
Computers

SOME FACTS:

1. **Computers are here to stay and the world will never be the same again.** There is no going back to a time where transactions are paper based only!
2. The credit union could not operate without its main computer system.
3. The world of family finance is  entirely run on computers and electronic movement of funds and data is standard.

However, all public and private organisations are legally obliged to protect any personal information they hold.

We (and you) handle personal information about individuals, you have a number of legal obligations to protect that information.



Computers

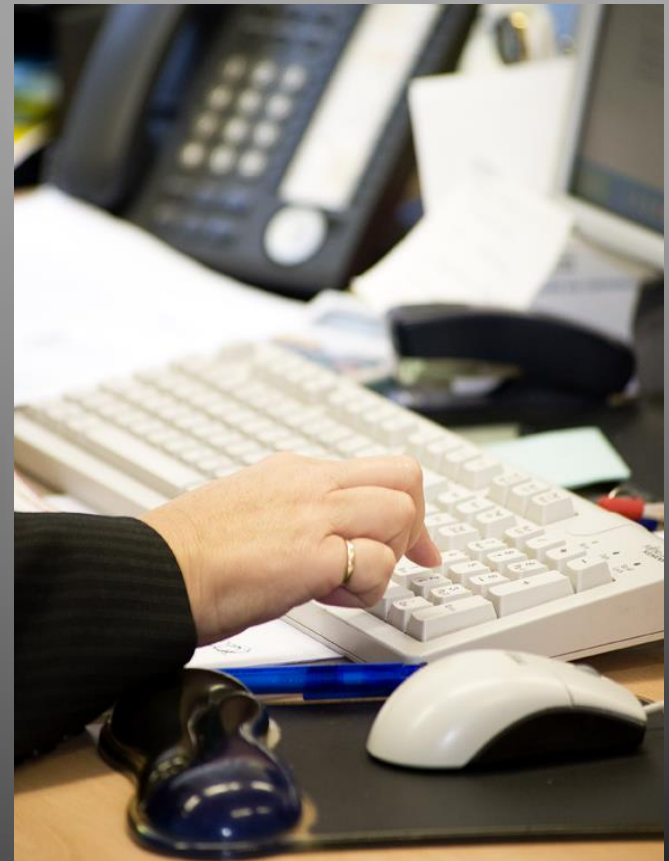
NEVER:

- **Introduce new unauthorised software**
- (because viruses may be attached that would threaten the credit unions systems).
- **Use for personal use without permission**
- (because the credit union is a place of work owned by its members with a purpose of providing a service).
- **Use personal data storage devices**
- (because viruses may be attached that would threaten the credit unions systems).
- **Copy the credit unions systems**
- (because they are the property of the credit union).

Computers

ALWAYS:

- **Report if a virus is detected on a computer**
- (because viruses would threaten the credit unions systems).
- **Ask for advice if in doubt at any stage of operation**
- (because people will gladly help).



Personal Data Must always be:

1. Fairly and lawfully processed;
2. Obtained only for specified and lawful purposes;
3. Adequate, relevant and not excessive;
4. Accurate and up to date;
5. Kept for no longer than necessary;
6. Processed in accordance with the rights of data subjects;
7. Protected by proper security;
8. Not transferred outside the European Economic Area without adequate protection.



What is Data Protection?

All public and private organisations are legally obliged to protect any personal information they hold.

If you handle personal information about individuals, you have a number of legal obligations to protect that information.

That information will be about credit union members but may also be about employees and volunteers.



Data Protection

Lets look at a few scenarios and decide whether they breach data protection or not?



Is this a Data Protection infringement?

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No!

As no personal information is released by the sending of an unused form, so rules are not infringed and a common sense approach should be taken.



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The credit union should *not* reveal information about a members account to any other person without the members express and written permission



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Breach – Personal details should be kept secure at all times



What are the rights of individuals?

The Data Protection Act 1998 gives individuals certain rights in relation to the use of their personal data. These rights are -

- The right of subject access - gives individuals the right to obtain information held about themselves.
- 
- The right to prevent direct marketing - individuals can ask you at any time not to use their personal information for direct marketing purposes.
 - The right to have personal information corrected - an individual has the right to have incorrect or misleading personal information held about them corrected.
 - The right to prevent automated decisions - this allows individuals to stop important decisions about them being made by solely automated means.

Some high-profile security breaches have increased public concern about the handling of personal information. As some **80% of security incidents involve staff** there is a clear need for all workers to have a basic understanding of the Data Protection Act 1998.

» This short course aims to explore the definition of data protection and personal data and give practical guidance on:

- **Keeping information secure**
- **Meeting the expectations of members**
- **Handling requests for personal information (subject access rights)**



What is NOT Personal Data?

What data is not covered by the legislation?

- Information on individuals who are no longer alive; the Act only covers information on living individuals >>
- Information which does not allow individuals to be identified – e.g. aggregated or anonymised data
- Information about Limited Companies and businesses



Is it Personal Data?



Newsletter for members

Is it Personal Data?

Yes



Register of members

No



Newsletter for members

Is it Personal Data?

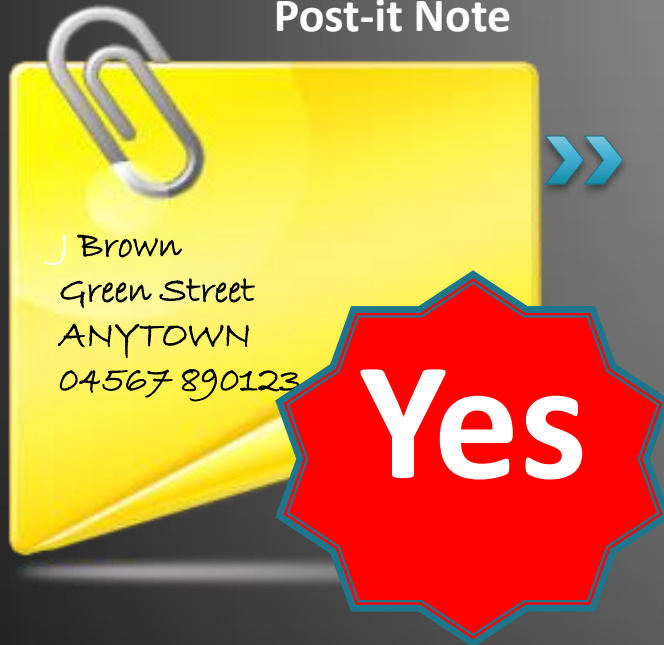
Post-it Note



Completed application form

Is it Personal Data?

Post-it Note



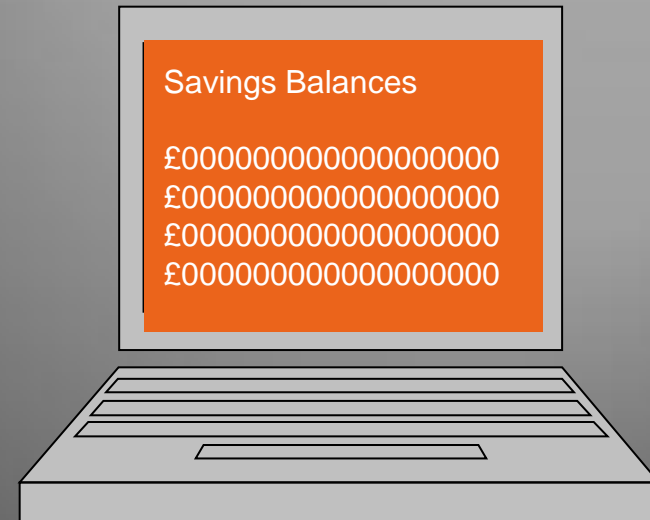
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Is it Personal Data?

Members ID details



Members savings balance



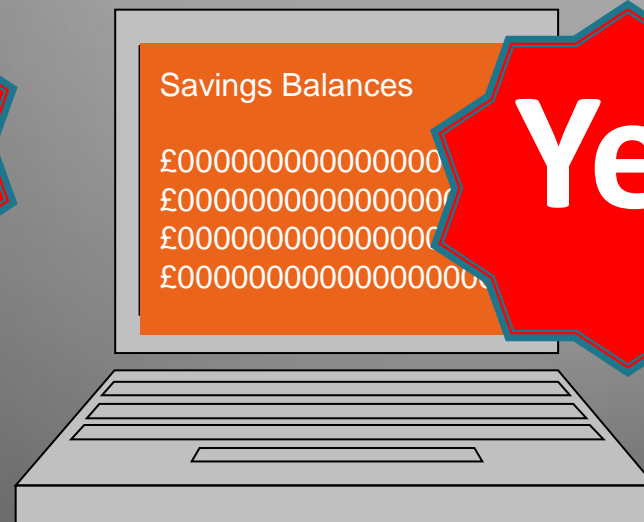
Is it Personal Data?

Members ID details



Yes

Members savings balance



Yes

What about The Freedom of Information Act?

The Freedom of Information Act deals with access to official information and gives individuals or organisations the right to request information from any public authority.

It is **NOT** relevant to  information held by credit unions

The Freedom of Information Act gives you the right to request information held by public authorities, companies wholly owned by public authorities in England, Wales and Northern Ireland and non-devolved public bodies in Scotland.

Useful tips to aid with Data Protection

- Do you keep passwords secure – change regularly, no sharing?
- Do you lock / log off computers when away from your desk?
- Do you dispose of confidential paper waste securely by shredding?
- Do you prevent virus attacks by taking care when opening emails and attachments or visiting new websites?
- Do you work on a 'clear desk' basis - by securely storing hard copy personal information when it is not being used?
- Do visitors sign in and out of the premises, or get accompanied in areas normally restricted to staff?
- Do you position computer screens away from windows to prevent accidental disclosures of personal information?
- Do you encrypt personal information that is being taken out of the office if it would cause damage or distress if lost or stolen?
- Do you keep back-ups of information?

Disclosing customer personal information over the telephone

Do you know:

- to be aware that there are people who will try and trick them to give out personal information?
- that to prevent these disclosures they you carry out identity checks before giving out personal information to someone making an incoming call?
- to perform similar checks when making outgoing calls?
- about limiting the amount of personal information given out over the telephone and to follow up with written confirmation if necessary



Data Protection

Members have the right to find out what information is held about them and to make sure it is correct. They can also opt out of direct marketing activities. If the request for information involves significant research or time spent in collating, we may charge them £5.00. Please refer these requests to your Supervisor.



Using the internet at the credit union?

- Must only be used for business purposes
- Examples of misuse include (but this is not an exhaustive list):
- Accessing, creating, copying, storing, transmitting or publishing material which is illegal, harmful, pornographic, obscene, vulgar, likely to irritate or waste the time of others, or subversive to the Credit Union;
- Using the internet for non-business purposes, including use in a private business;
- Corrupting any information held or transmitted on the Internet;
- Disrupting the normal functions of the Internet (such as introducing viruses).



Using the email at the credit union?

- Remember that e-mail has the same legal status as any other written communication, i.e.. it can be disclosed in Court and in litigation;
- Avoid messages that might cause offence to the recipient;
- The tone should be friendly but business-like;
- Take care to address e-mails to the correct recipient – it is easy to inadvertently misdirect them;
- Don't congest the network with trivial messages or copy them unnecessarily;
- Save paper by only printing e-mails if you really need to;
- Don't join in chain or pyramid letters or similar.



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Staff may not use the Credit Union computer system for private emails.





Myth – “The Data Protection Act stops parents from taking photos in schools”.



Myth – “The Data Protection Act means a company is never allowed to give a customer’s details to a third party”.



Myth – “The Data Protection Act stops parents from finding out their children’s exam results”.



“Myth: The Data Protection Act prevents priests from naming sick parishioners during church prayers”.

Finally remember that members will never easily forgive the credit union for breaking the basic rules of confidentiality!



Thanks for completing this course



**PLEASE COMPLETE
THE FEEDBACK FORM**