INFORMATION SECURITY POLICY

A CORNWALL
COUNCIL COMPANY

Policy Title	**Information Security Policy**		
Version	01	Status	Final
Date	06/01/2026	Author	Head of Business Systems
Next Review Date:	06/01/2027	Approved by	ELT
Responsible Officer:	Head of Systems and Data	Date Approved	06/01/2026
Associated documents		EIA Completed by	

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1. BACKGROUND AND PURPOSE

1.1. Cornwall Housing Limited (CHL) is an ALMO who delivers a range of services to the stock it manages on behalf of Cornwall Council. This policy outlines the information security responsibilities and practices specific to CHL and specifically the Business Systems Team, in alignment with the overarching Information Security Policy provided by Cornwall Council.

2. SCOPE

2.1. This policy applies to all CHL employees who utilise or manage and support the following applications:

- Open Housing
- LifeSpan
- DocuWare

2.2. It covers data handling, access control, incident reporting, and system maintenance within the scope of these applications.

3. GOVERNANCE

3.1. The overarching Information Security Policy is owned and maintained by Cornwall Council.

3.2. CHL's business systems team is responsible for ensuring compliance with that policy within the context of the applications it manages.

3.3. Any deviations or risks identified must be escalated to the partner organisation's Information Security team.

4. KEY SECURITY PRACTICES

4.1. Access Control: role-based access must be enforced. All access requests and changes must be documented.

4.2. Data Protection: sensitive data must be encrypted in transit and at rest. Data retention policies must be followed.

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4.3. Patch Management: applications must be kept up to date with security patches applied promptly.

4.4. Incident Reporting: any suspected or actual security incidents must be reported immediately to the partner organisation and documented internally.

4.5. Third-Party Integrations: must be reviewed and approved by the partner organisation's security team before implementation.

5. ROLES AND RESPONSIBILITIES

5.1. CHL Head of Systems and Data: Accountable for ensuring team compliance and liaising with the partner organisation.

5.2. Systems and Data Team (Application Owners): Responsible for implementing security controls, managing access, and maintaining audit trails.

5.3. All CHL employees: Must follow secure working practices, report incidents, and complete mandatory security training provided by Cornwall Council.

6. COMPLIANCE AND REVIEW

6.1. This policy will be reviewed annually or upon significant changes to the applications or overarching policy.

6.2. Non-compliance may result in disciplinary action and must be reported to the partner organisation.

7. APPLICATION SPECIFIC RISK

The following risks are associated with the applications managed by the CHL business systems team:

7.1. Personally Identifiable Information (PII) Exposure: applications may store tenant names, addresses, contact details, and financial information.
- Risk of data breach through misconfigured access controls, insecure APIs, or phishing attacks.

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7.2. Payment and Rent Processing Vulnerabilities: systems handling rent payments or arrears may be targeted for financial fraud.
- Risks include insecure payment gateways, lack of transaction logging, and weak authentication.

7.3. Integration with External Systems: applications integrations with any of the following: CRM, finance, and contractor systems.
- Risks include insecure data transfer, lack of encryption, and third-party vulnerabilities.

7.4. Mobile and Remote Access: staff and contractors may access systems remotely or via mobile devices.
- Risks include device theft, unsecured Wi-Fi, and lack of multi-factor authentication.

7.5. Data Retention and Disposal: applications may retain sensitive data beyond its required lifecycle.
- Risks include non-compliance with GDPR and potential exposure of outdated records.

7.6. Role-Based Access Mismanagement: incorrectly assigned roles can lead to excessive privileges.
- Risks include unauthorized data access and accidental data modification or deletion.

7.7. Incident Response Gaps: lack of clear procedures for reporting and responding to application-specific incidents.
- Risks include delayed containment, poor communication, and regulatory non-compliance.

8. REFERENCE DOCUMENTS

8.1. Partner Organisation Information Security Policy
8.2. Internal procedures and documentation relevant to application management.

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DIVERSITY & INCLUSION

We are committed to treating all people with fairness and respect. We aim to create an inclusive environment where people are treated with dignity, inequalities are challenged, and we anticipate and respond positively to different needs and circumstances to enable individuals to achieve their potential and foster good relations within the communities we serve. We want to be recognised as an organisation delivering fair, inclusive, accessible services and an employer and partner of choice.

When applying this policy, we act sensitively towards the diverse needs of individuals and to reduce discrimination and harassment by making reasonable adjustments such as:

- eliminating discrimination – by providing support to those who need it and information in accessible formats and languages on request.

- tailoring the policy to meet both the specific needs of the individual, including those with additional support needs, and the diverse needs of the wider community

- advancing equality of opportunity – treating all tenants fairly

- fostering good relationships – listening to customers and responding appropriately

- compliant with all aspects of Equality & Diversity legislation, and specifically the Equality Act 2010.

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Alternative formats:

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact info@cornwallhousing.org.uk

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