

INFORMATION EXCHANGE PROTOCOL FOR HOUSING RELATED MATTERS

1. Parties/Signatories

Chief Constable	Avon and Somerset Constabulary
Chief Executive	Bristol City Council
Chief Executive	North Somerset Council
Chief Executive	Sedgemoor District Council
Chief Executive	West Somerset District Council
Chief Executive	South Gloucestershire Council
Chief Executive	Orbit Housing Association, Bristol
Chief Executive	Somer Housing Association (Bath and North East Somerset)
Chief Executive	Knightstone Housing Association
Chief Executive	Bristol Churches Association
Chief Executive	Guinness Trust
Chief Executive	Redland Housing Association
Chief Executive	United Housing Association
Chief Executive	Solon Housing Association
Chief Executive	Signpost Housing Association
Chief Executive	South Somerset Homes
Chief Executive	Mendip Housing
Chief Executive	Southwest Housing Co-operative
Chief Executive	Sovereign Housing
Chief Executive	Sanctuary Housing
Chief Executive	Hastoe Housing Association Ltd
Chief Executive	King's Barton Housing Association
Chief Executive	Jephson Housing Association Group
Chief Executive	Second Step Housing Association
Chief Executive	Magna West Somerset Housing Association

1.1 It will be the responsibility of these signatories to ensure that:

- realistic expectations prevail from the outset;
- ethical standards are maintained;
- a mechanism exists by which the flow of information can be controlled;
- appropriate training is provided;
- adequate arrangements exist to test adherence to the protocol.

2. Purpose

The purpose of this protocol is to manage the exchange of information in order to facilitate joint working between the constabulary and Local Authority Housing Departments, Registered Social Landlords and/or their legal representatives, to prevent crime or disorder, promote public safety and protect the rights and freedoms of others in accordance with Articles 6, 8 and Article 1 Protocol 1 of European convention on Human Rights as provided for by the Human Rights Act 1998.

It also identifies where other mechanisms exist to facilitate an exchange of information for the same basic aims. One example is the Crime and Disorder Act 1998 (see also section 7.1 D).

To be effective in facilitating the necessary exchange of information, this protocol will operate within the provisions of the following legislation:

- Housing Act 1985
- Housing Act 1988
- Housing Act 1996
- Human Rights Act 1998
- Data Protection Act 1998
- Crime and Disorder Act 1998

This protocol is mainly concerned with the exchange of personal information. Therefore, where de-personalised information is requested the assumption is that this information will be shared. Wherever possible, information that does not identify individuals should be used and disclosed. An outline guide to the disclosure process of police held information, described in this document, is attached at **Appendix E**.

It must be recognised that this document can not provide clear guidance on every type of scenario and should be used only as an overall guide. As each 'case' must be treated on its own merit, it may be necessary for organisations to seek specialist advice before requesting or disclosing any personal information.

3. Introduction

The signatories to this document subscribe to the following:

- the agreed standards must provide safeguards and an appropriate framework for the controlled exchange of relevant information;
- that Data Protection principles will be upheld
- that this protocol will be reviewed annually;
- that any partner may request a change to the protocol at any time by submitting to the protocol holder a suggested revision;

The nominated holder of this protocol is the Head of Corporate Information Management, Avon and Somerset Constabulary, who shall on behalf of the signatories:

- ensure that a review is carried out on an annual basis;
- circulate all requests for change, co-ordinate responses, obtain agreement for the changes from the partnership and distribute codes of practice and guidance as these become available.

4 Administrative Procedures

4.1 Review and Weeding of Data

One of the principles within the data protection legislation states that excessive data must not be retained. It follows that information must be removed as soon as it is no longer required for the original purpose for which it was supplied or collected (principles 3 & 5 apply).

Therefore, retention should be for the minimum period required to achieve the objectives of the disclosure after which the data will be returned to the originator or destroyed as agreed. For example, in connection with an Anti-Social Behaviour Order the only information to be retained should be the date and conditions, all other data should be weeded when the order is obtained and the appeal period expired.

4.2 Data Quality

Information discovered to be inaccurate or inadequate for the purpose will be notified to the data owner who will be responsible for correcting the data and notifying all other recipients of the data who must ensure that the correction is made.

4.3 Charges for the supply of information

There will normally be no charge for disclosure of information pursuant to this policy. However, the constabulary reserves the right to charge in circumstances where it is considered that the disclosure of such information may place an onerous burden on the constabulary. For example, producing copy videotapes, where it is necessary to 'edit' third party images.

4.4 Security of information/information systems

All partners must ensure that a baseline level of security is in place to ensure compliance with principle 7 of the Data Protection Act. The security standard must be compatible with ISO 17799/BS 7799.

4.5 Complaints and Breaches

Any complaint made will be brought to the attention of the appropriate officer of the

relevant partner agency(s), and they will be dealt with in accordance with their own policies and procedures. Where appropriate, partners will keep each other informed of developments following a complaint received.

4.6 Training

Each partner is responsible for ensuring that appropriate members of staff are adequately trained in respect of all matters covered in this protocol.

4.7 Indemnity

Each partner shall be fully indemnified by the other partners in accordance with the indemnity contained in **Appendix C**.

4.8 Confidentiality

Each partner shall at all times keep confidential all personal data supplied pursuant to this agreement. This clause shall survive termination of the agreement or the withdrawal of or removal of any partner. This means that no publication of data supplied pursuant to this agreement will identify any individual.

5 Requests for Information from the data subject

5.1 Subject Access Requests

All requests for information under the subject access provisions of the Data Protection Act 1998 will be dealt with by the person responsible for Data Protection within the organisation. If personal data is identified as belonging to another partner, it will be the responsibility of the receiving partner to contact the Data Protection Officer for the originating partner to determine whether the latter wishes to claim an exemption under the provisions of the Data Protection Act.

Where a data controller cannot comply with the request without disclosing information relating to another individual who can be identified from that information, he is not obliged to comply with the request unless:

- a) the other individual has consented to the disclosure of the information to the person making the request, or
- b) it is reasonable in all the circumstances to comply with the request without the consent of the other individual. In determining whether it is reasonable, regard shall be had, in particular, to:
 - any duty of confidentiality owed to the other individual;
 - any steps taken by the data controller with a view to seeking the consent of the other individual;

- whether the other individual is capable of giving consent;
- any express refusal of consent by the other individual.

5.2 Freedom of Information

Requests for personal information under the Freedom of Information Act, will be dealt with under the amended 'subject access' provisions of the Data Protection Act.

Partners are reminded that these agreements should be publicly available.

6 Disclosure of Information between partner organisations

Disclosure of any personal data must be bound to both common and statute law, for example defamation, the common law duty of confidence, the Data Protection Act 1998, and the Human Rights Act 1998.

The data protection principles (**see Appendix A**) require that such information is obtained and processed fairly and lawfully; is only disclosed in appropriate circumstances; is accurate, relevant, and not held longer than necessary; and is kept securely.

The Human Rights Act 1998 (**See appendix B**) gives further effect in domestic law to certain Articles of the European Convention on Human Rights (ECHR). The Act requires all domestic law to read compatibly with the Convention Articles. It also places a legal obligation on all public authorities to act in a manner compatible with the Convention. Should a public authority fail to do this then it may be subject of a legal action under section 7. This obligation should not solely be seen in terms of an obligation not to violate Convention Rights but also as a positive obligation to uphold these rights.

The sharing of information between agencies has the potential to infringe a number of Convention Rights. In particular, Article 3 (Freedom from torture or inhuman or degrading treatment), Article 8 (Right to private and family life), and Article 1 of Protocol 1 (Protection of Property). In addition all Convention Rights must be secured without discrimination on a wide variety of grounds under Article 14 (Prohibition of Discrimination).

The Convention does allow limited interference with certain Convention rights by public authorities under broadly defined circumstances known as legitimate aims. However, mere reliance on a legal power may not alone provide sufficient justification and the following principles should be considered:

- is there a legal basis for the action being taken;
- does it pursue a legitimate aim (as outlined in the particular Convention article);

- is the action taken proportionate and the least intrusive method of achieving that aim;

7.1 Personal Data - Power to Disclose

If failure to share personal information means that the purpose of this protocol could not be achieved, each party must carefully consider each of the following questions prior to making any decision.

A) Has the data subject given his/her informed consent to the exchange of information about them?

Many of the data protection issues surrounding the disclosure can be avoided if the informed consent of the individual has been sought and obtained. Consent must be freely given after the alternatives and consequences are made clear to the person from whom permission is being sought. If the data is classified as sensitive data the consent must be explicit. In this case the specific detail of the processing should be explained:

- the particular types of data to be processed;
- the purpose of the processing;
- any special aspects of the processing which may affect the individual, e.g. disclosures.

No details of victims, witnesses or complainants should be disclosed without their written consent (*Swinney v Chief Constable of Northumbria*).

B) Are proceedings being considered under Grounds 2, 2A, 3 and 4 of Schedule 2 Housing Act 1985 as amended, or under grounds 13, 14, 14A and 15 of Schedule 2, Housing Act 1988 as amended?

C) Are proceedings being considered for injunctions against antisocial behaviour under Section 152, housing Act 1996?

D) Does Section 115 of Crime and Disorder Act 1998 apply?

Where the disclosure is necessary or expedient for the purposes of any provision of the Act, Section 115 ensures all agencies have a power to disclose; it does not impose a requirement on them to exchange information and control remains with the partner that holds the data.

Disclosure made under the provisions of this Act, must be made in accordance with the "Avon and Somerset Partnership, Information Exchange Protocol, Crime and Disorder Act 1998".

E) Is it in the 'Public Interest' to disclose?

If informed consent has not been sought, or sought and withheld, the partner must consider if there is an overriding public interest of justification for the disclosure. In making this decision the following should be considered:

- is the disclosure necessary for the prevention or detection of crime, prevention of disorder, to protect public safety, or to protect the freedoms of others;
- is the disclosure necessary for the protection of young or other people;
- what risk to others is posed by this individual;
- what is the vulnerability of those who may be at risk;
- what will be the impact of the disclosure;
- is the disclosure proportionate to the intended aim;
- is there an equally effective but less intrusive alternative means of achieving that aim.

F) Is the proposed disclosure compatible with the Human Rights Act- in particular, Article 8?

Article 8 of the Human Rights Act 1998 states that everyone has the right to respect for his private and family life, his home and his correspondence and that there shall be no interference by a public authority with this right except as in accordance with the law, in particular: -

- public safety;
- the prevention of crime or disorder;
- the protection of health or morals;
- the protection of the rights or freedoms of others.

G) Is the disclosure a proportionate response?

The principle of 'proportionality' is a common theme running through both the Convention rights and judgements of the European Court. It is explicitly expressed in the limitations contained in Articles 8 - 11 where it is stated that any interference or restriction of those rights must be lawful and 'necessary in a democratic society'. Any restriction of rights must, therefore, be justified in that a fair balance must be achieved between the protection of an individual's rights with the general interests of society. In the context of information exchange, any disclosure of information should be restricted to a minimum and be the least damaging that is required in achieving the objective.

7.2 Extent of Personal Data Disclosed

Disclosure of personal data must be relevant and the minimum amount required for the purpose.

The identity of the originator must be recorded against the relevant data. No secondary

use or other use may be made unless the consent of the disclosing party to that secondary use is sought and granted. Disclosure must be compatible with the second data protection principle: 'Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes'.

7.3 Requesting /disclosing personal information.

7.3.1 General principles

Requests for information must always be made in writing, as will all responses. **Appendix F** contains a pro-forma guide for requesting information. No personal information should be disclosed by telephone or via an un-encrypted e-mail. If faxed, the sender should ensure that the recipient is ready to receive the transmission. It is the responsibility of the sender to take reasonable precautions to protect the information being sent.

Each partner agency will nominate an officer or designated role to facilitate the request and/or disclosure of information. A list of these are contained at **Appendix D**.

Requests from unauthorised organisations/staff will be declined.

This process will provide evidence if the disclosure is challenged or formal complaint is made. Clear records of the evidence provided by various partners will be required to justify any challenges of the proportionality of the action taken.

7.3.2 Housing Act

Disclosures will only be considered, where the Local Authority, Social Landlord or their legal representative are considering proceedings for either:

- possession under Grounds 2 or 2A, 3 and 4 of Schedule 2, Housing Act 1985 as amended;
- possession under grounds 13,14, 14A and 15 of Schedule 2, Housing Act 1988 as amended;
- injunctions against antisocial behaviour under s152 Housing act 1996;
- Tenant transfers.

Where these requirements are met, the following will apply:-

A) *Convictions/Cautions*

Relevant convictions, cautions and in some cases pending prosecutions may be

disclosed by the constabulary concerning:

- the tenant;
- any occupier of the property or;
- any visitor to the property.

The test of relevance is whether the information relates to the grounds for possession, e.g. a conviction for dangerous driving may be relevant to a nuisance case if it occurred in the area (or locality), or convictions against a visitor for possession of drugs may be relevant in a case where the grounds for possession are nuisance by use of the premises for the supply of drugs.

The disclosure of impending prosecutions may only be disclosed where it is imperative that housing matters are not delayed until after criminal proceedings are complete. Requests for the disclosure of impending prosecutions must be made through the Avon and Somerset Constabulary, Corporate Information Management team, who will arrange for the appropriate authority from an officer of ACPO rank.

B) Police Command and Control and Crime Recording systems

Details of incidents will be disclosed if reported by one or more of the following:

- tenants or occupiers of tenanted properties
- third parties in respect of tenanted properties

Third party personal details will always be deleted from records prior to disclosure. In the majority of cases copies of incident logs generated from the constabulary 'Command and Control' system will not be disclosed but the basic details of police attendance will be provided by the designated 'Housing' disclosure officer, by way of letter. If a full copy of the log is required then advice should be sought from the Corporate Information Unit.

C) Manual information

Documents originating from a third party source will not be disclosed without their consent (see also section 7.1 (A)).

Constabulary 'internal' documents will not be copied for disclosure without a court order. However their contents may be disclosed by means of letter.

Statements made by Police Officers may be released*

Statements made by other witnesses will not be disclosed without their explicit written consent (see also section 7.1 (A))*.

*Statements may only be released prior to court with the consent of the CPS. Such requests should be made through the constabulary legal services dept. Factual information only will be supplied. No matters of opinion will be disclosed.

D) Method of disclosure

All disclosures are discretionary and requests must be dealt with on a case by case basis. See also sections 7.3.1 and 7.3.2 (A).

7.3.3 Anti-social behaviour

Anti-social behaviour can be tackled in the arena of criminal prosecution or at a more local level as a practical problem to be actively addressed under a multi-agency approach.

Nuisance behaviour may be tackled under the Harassment Act, or under the power of an Anti-Social Behaviour Order (ASBO), but the burden of proof and the potential impact on the 'offender' may not be proportionate to the level of nuisance. It is recognised that this type of problem must be addressed in a positive way, but to elevate nuisance behaviour to this level is not always the most appropriate approach.

When dealing with the issues under the Harassment Act or as an ASBO, there are already clearly defined approaches to the investigation and eventual 'prosecution'. For example there are agreed means of multi-agency case conferences to discuss and exchange information about an individual who is being considered for an ASBO, by one of the partner agencies.

To deal with nuisance out-side of the 'criminal' arena requires a joint approach to identifying 'problem' individuals and sharing sufficient information to enable the most appropriate partner agency to achieve an effective result.

There are several types of multi-agency working, operating across the country, all with different scheme titles. However, all rely on the general concept that by operating under a crime and disorder strategy, sufficient information may be disclosed between the partners to establish the best course of action and who should pursue it to its conclusion. The provisions for this activity in the Avon and Somerset police area are contained in the Avon and Somerset Partnership, Information Sharing Protocol, Crime and Disorder Act 1998.

The specific mechanisms operating between particular partners should be subject to a separate and specific agreement. Such an agreement must take into account that the general rules of disclosure must still apply, even if there is a power to disclose for Crime and Disorder purposes. *See Section 7.1 (A) – (G)*

7.3.4 Vetting

Avon and Somerset Constabulary will not undertake the routine vetting (criminal records, crime and/or intelligence system checks) of prospective tenants.

7.3.5 Domestic violence

In circumstances where individuals require, or are required to transfer housing because they have been the victim of domestic violence, the constabulary will, on a case by case basis, consider the disclosure of relevant convictions, crime reports, domestic violence reports and statements, to assist the process. It is anticipated that such requests will always be supported by the data subjects written consent to information sharing and that third party details will not normally be disclosed, even if known to the data subject or the originator of the request.

8 Signatures

By signing this document the participants accept and will adopt the statements included in this protocol and the indemnity, and agree to maintain the specified standards. In addition, the partners will not use, release or otherwise disclose any information whatsoever:

- to any organisation which is not a signatory to this protocol, or
- for any other secondary use not specified in this document.

Signed on behalf of: -

Name of organisation and address;

Position/Job title;

Signature;

Dated this [] day of [] 2004

DATA PROTECTION ACT 1998

Principle 1

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

- at least one of the conditions in Schedule 2 is met and;
- in the case of sensitive data at least one of the conditions in Schedule 3 is also met.

Principle 2

Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.

Principle 3

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

Principle 5

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Principle 6

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Principle 7

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Principle 8

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedom of data subjects in relation to the processing of personal data.

HUMAN RIGHTS

Article 2 - Right To Life

Everyone's right to life shall be protected by law

Article 3 - Prohibition of Torture, Inhuman or Degrading Treatment

No one shall be subjected to torture or to inhuman or degrading treatment or punishment.

Article 4 - Prohibition of Slavery and Forced Labour

No one shall be held in slavery or servitude.

No one shall be required to perform forced or compulsory labour.

Article 5 - Right to Liberty and Security

Everyone has the right to liberty and security of person.

Article 6 - Right to a Fair Trial

In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

Article 7 - No Punishment Without Law

No one shall be held guilty of any criminal offence on account of any act or omission which did not constitute a criminal offence under national or international law at the time when it was committed.

Article 8 - Right to Respect for Private and Family Life

Everyone has the right to respect for his private and family life, his home and his correspondence.

There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law.

Article 9 - Freedom of Thought Conscience and Religion

Everyone has the right to freedom of thought, conscience and religion;

Article 10 - Freedom of Expression

Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.

Article 11 - Freedom of Assembly

Everyone has the right to freedom of association with others, including the right to form and to join trade unions for the protection of his interests.

Article 12 Right to Marry

Men and Women of marriageable age have the right to marry and to found a family, according to their national laws governing the exercise of this right.

Article 14 - Prohibition of Discrimination

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

Article 16 Restriction on the Political Activity of Aliens

Nothing in articles 10,11 and 14 shall be regarded as preventing the High Contracting Parties from imposing restrictions on the political activity of aliens.

Article 17 - Prohibition of Abuse of Rights

Nothing in this Convention may be interpreted as implying for any State, group or person any right to engage in any activity or perform any act aimed at the destruction of any of the rights and freedoms set forth herein or at their limitation to a greater extent than is provided for in the Convention.

Article 18-Limitation on use of Restrictions on Rights

The restrictions permitted render this Convention to tire-said rights and freedoms shall not be applied for any purpose other than those for which they have been prescribed.

The First Protocol**Article 1 - Protection of Property**

Every natural or legal person is entitled to the peaceful enjoyment of his possessions.

Article 2 - Right to Education (subject to UK reservation)

No person shall be denied the right to education.

Article 3 - Right to Free Elections

The High Contracting Parties undertake to hold free elections at reasonable intervals by secret ballot

The Sixth Protocol**Article 1 - Abolition of Death Penalty**

The death penalty shall be abolished. No one shall be condemned to such penalty or executed.

Article 2 - Death penalty in Time of War

A State may make provision in its law for the death penalty in respect of acts committed in time of war or imminent threat of war.

FORM OF INDEMNITY

1. In consideration of the provision of information in accordance with (insert details of agreement or arrangement under which information is to be supported, and insert name of authority granting indemnity) undertakes to indemnify any of the persons or any authority referred to in paragraph 2 below against any liability which may be incurred by such person or authority as a result of the provision of such information.

Provided that this indemnity shall not apply:

- (a) where the liability arises from information supplied which is shown to have been incomplete or incorrect, unless the person or authority claiming the benefit of this indemnity establishes that the error did not result from any wilful wrongdoing or negligence on its part or on the part of any other person or authority referred to in paragraph 2 below;
 - (b) unless the person or authority claiming the benefit of this indemnity notifies (insert name of authority granting indemnity) as soon as possible of any action, claim or demand to which this indemnity applies, permits (insert name or authority granting indemnity) to deal with the action, claim or demand by settlement or otherwise and renders (insert name of authority granting indemnity) all reasonable assistance in so dealing.
 - (c) to the extent that the person or authority claiming the benefit of the indemnity makes any admission which may be prejudicial to the defence of the action, claim or demand.
2. Persons who may claim the benefit of this indemnity are as follows:
 - (a) any police authority;
 - (b) any chief officer of police;
 - (a) any serving or former member of a police force;
 - (d) any serving or former civilian of a police authority;
 - (f) any local authority;
 - (g) any employee or former employee of a local authority;
 - (h) any employee or former employee of a Registered Social landlord;

and in this paragraph the expressions "police authority", "chief officer of police" and "police force" have the same meaning as in section 101 of the Police Act 1996.

NOMINATED OFFICERS

Avon and Somerset Constabulary:

District Inspectors

A District,
Trinity Road Police Station, Bristol

Management Support Unit,
Sector Inspector

B District,
Broadbury Road Police Station, Bristol

Performance Review Unit,
Inspector

C District,
Southmead Road Police Station, Bristol

Inspector, Critical Incident Manager

D District,
Staple Hill Police Station

Community Safety Manager

E District,
Bath Police Station

Inspector, Intelligence Manager

F District,
Yeovil Police Station

Yeovil Sector Inspector

G District,
Taunton Police Station
Bridgwater Police Station
Burnham-on-Sea Police Station
Minehead Police Station

Split into Sectors:
Sector Deputy
Sector Deputy
Sector Deputy
Sector Deputy

J District,
Weston Super Mare Station

Inspector, Crime Reduction Unit

Housing Associations:

Orbit Housing Association,
South West Area Office,
Ground Floor,
Stanway House,
Almondsbury Business Centre,
Woodlands,
Bradley Stoke, Bristol BS32 4GH

Michael Prince,
Housing Manager,
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Knightstone Housing Association
Backfields House,
Upper York Street, Bristol BS2 8WF

Jayne Whittlestone
jaynew@knightstone.co.uk

Housing Services Manager
Bristol Churches Housing Association
1–3 Surrey St
Bristol BS2 8JR

Michael Lydon
0117 970 4516
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Guinness Trust
1/2 Osprey Court
Hawkfield Way
Hawkfield Business Park
Bristol BS14 0GT

Judith Forde

Redland Housing Association
Holly House
Corbett Close
Lawrence Weston
Bristol BS11 0TA

Dave Clarke

United Housing Association
174 Cheltenham Road
Bristol BS6 5RE

Pat Androde

Solon Housing Association
1 Newfoundland Court
Newfoundland Street
Bristol

Sarah Wilde

Somer Housing Association
Somer Community Housing Trust
The Maltings,
River Place,
Lower Bristol Road,
Bath BA2 1EP

Jo Cosgrove
01225 366189

Signpost Housing Association
115 Sidwell St., Exeter EX4 6RY
(properties in Burnham-on-Sea)
South Somerset Homes
South Somerset House
Alvington
Yeovil
BA22 8WN

Pauline Watts pauline.watts@sha.co.uk
Area Team Manager
01392 254388
Chief Executive:
Geoff Atkinson

Designated Officer:
Emily Gasson
Solicitor for South Somerset Homes

Mendip Housing
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BA4 5LB

Chief Executive:
Peter Chapman

Designated Officer:
Linda McLaughlin
Housing Team Leader

Southwest Housing Co-operative
Jane Emanuel, Chief Executive
The Old Railway Station
Sea Mills Lane
Stoke Bishop
Bristol. BS9 1DX

Designated Officer:
Martin Carney
The Grange
Durleigh Road
Bridgwater
Somerset TA6 7HU

Sovereign Housing
Ann Santry, Chief Executive
Berkshire House
17-24 Bartholomew Street
Newbury RG14 5LL

Designated Officer:
Jane O'Donnell
Old Chapel Building
635A Gloucester Road
Horfield
Bristol BS7 0BJ

Sanctuary Housing Association
Wessex Region
Chipping Sodbury Area Office
5 Bowling Hill Business Park
Quarry Road
Chipping Sodbury
Bristol BS37 6JL

Steve Prime
Housing Manager
01454 320808

Hastoe Housing Association
Mr J A Williamson, Chief Executive
Fleur de Lis
Middlemarsh Street
Dorchester
DT1 3GX

Shirley Evans-Jones
Regional Manager

King's Barton Housing Association Ltd
5 Moravian Road
Kingswood
Bristol
BS15 8LY

Patricia O'Driscoll
General Manager
0117 961 1171
kingsbarton@ukonline.co.uk

Jephson Housing Association Group
South & West
450 Woodlands Court
Ash Ridge Road
Bradley Stoke
Bristol BS32 4LB

Sheila Turner
Housing Services Officer
01454 618822
bristol@jephson.org.uk

Second Step Housing Association
9 Brunswick Square
St Pauls
Bristol BS2 8PE

Aileen Edwards
Director

Magna West Somerset Housing Assc.
St Peters House
Bridge Street
Williton
Taunton TA4 4NR

Tony Murray
Director

Local Authorities:

South Gloucestershire Council,
Housing Dept.,
Civic Centre, High St.,
Kingswood,
Bristol. BS15 9TR

Bryn Anstice,
(Anti-social behaviour)
bryn_anstice@southglos.gov.uk

South Gloucestershire Council,
Legal Dept.,
Castle St., Thornbury,
Bristol. BS35 1HF

Andrew Griffiths,
(Solicitor)
andrew_griffiths@southglos.gov.uk

North Somerset Council
Town Hall
Weston Super Mare
BS23 1UJ

Mary Cox,
Legal Department
01934 634941
mary.cox@n-somerset.gov.uk

Sedgemoor District Council
Bridgwater House
King Square
Bridgwater
Somerset
TA6 3AR

Miss EJ Sawyer
Senior Housing Officer
01278 435435

Bristol City Council
Director Neighbourhood
and Housing Services, Ian Crawley
The Council House

Area Services Manager
The Council House
College Green
Bristol

College Green
Bristol BS1 5TR

BS1 5TR

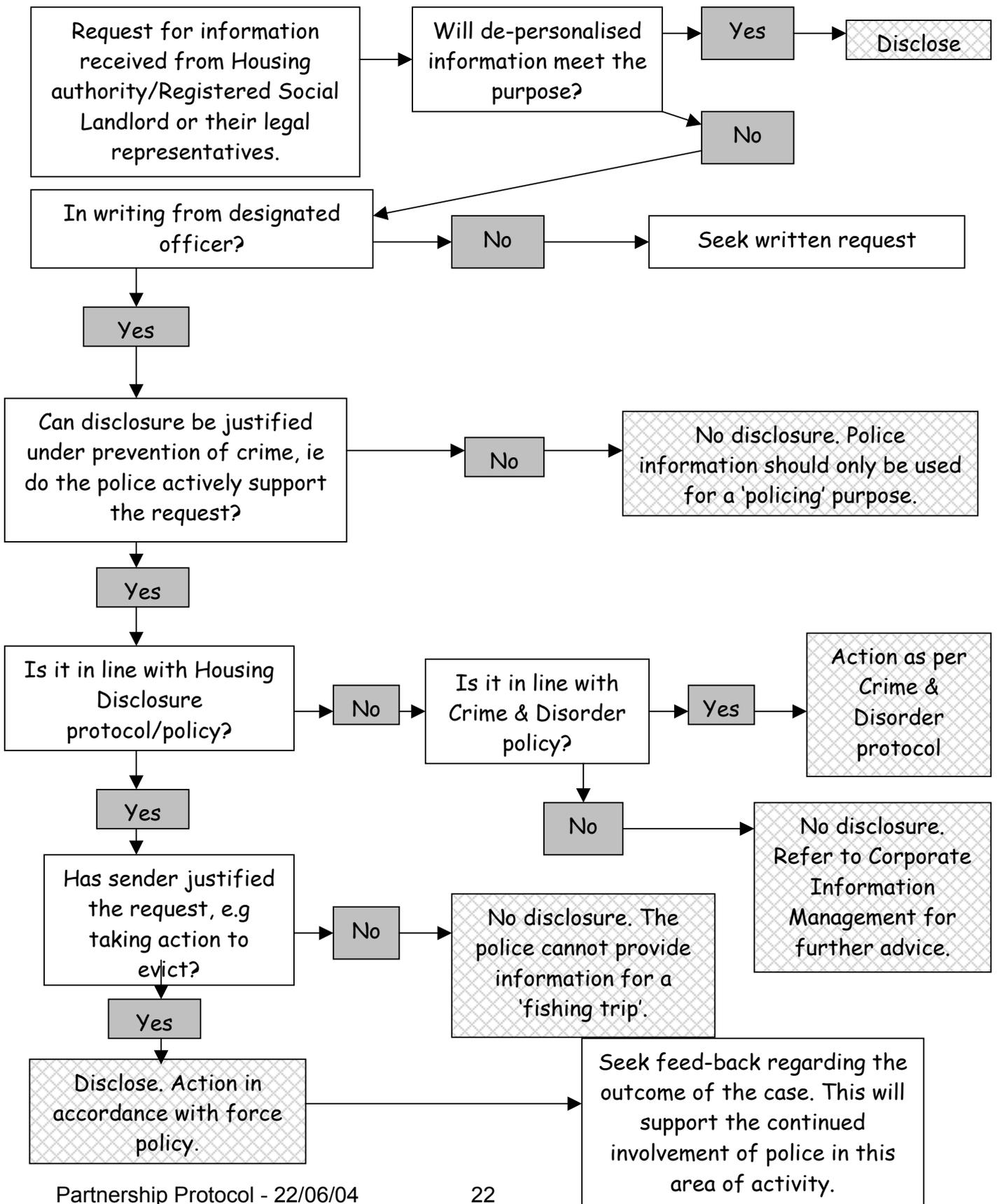
Anti Social Behaviour Manager
Bristol City Council
The Council House
College Green Bristol BS1 5TR
Bristol City Council solicitors:
Principal Solicitor (Litigation)
Senior Solicitor (Housing and Property)
Other Solicitors
Romney House
Romney Avenue
Bristol BS7 9TB

West Somerset District Council
20 Fore Street
Williton
Somerset
TA4 4QA

Chief Executive
Tim Howes

HOUSING DISCLOSURE PROCESS CHART

Appendix E



Pro-forma Letter requesting personal information

To : Sector Inspector / Deputy

Date:
Your Ref:
Our Ref:
Enquiries to:
Tel:
Fax:
DX:

Dear Sir

DISCLOSURE IN RESPECT OF: ADDRESS:

In line with Avon and Somerset Constabulary Housing Disclosure procedures and protocol, I would be grateful if you could supply me with the following information relating to the above named who is a tenant of this authority.

Following allegations to the Council about anti-social behaviour and criminal activity of the tenant and his/her/their visitors at or near the above address, the Council are considering Civil Proceedings in the County Court :-

- to recover possession of the tenancy under ground 2 or 2A, Sch 2 1985 Housing Act (as amended by the 1996 Housing Act)
- to pursue an anti-social behaviour injunction under S.152 Housing Act 1996

Details are urgently required as to whether the tenant has any convictions for:

- using the address or allowing the address to be used for illegal or immoral purpose
- serious arrestable offences committed at or near the tenancy address and in addition, whether any of the tenants family or visitor has been convicted of a serious arrestable offence committed at or near the address.
- cautions given to the tenant, tenants family or visitors for offences committed at or near the address.

Insofar as you are able to and on the basis that they are considered relevant, can you also please supply details of the date and venue of any conviction(s) caution(s) together with details of any search warrants executed at the address or other attendance's at the

address with dates on which these took place together with details of any arrests or charges in respect of them.

We confirm that any information so disclosed will only be considered by the Legal Department and used for no other purposes than in pursuance of the proceedings described.

Yours faithfully

**Solicitor/Legal Officer
Legal & Democratic Services**