

Friends of Greenhill Library

Data Protection and Data Security Policy

Created by: Chris Brown, Approved 11-04-2018

Statement of policy and purpose of Policy

1. The Friends of Greenhill Library is a registered charity responsible for the running of Greenhill Community Library. The charity is committed to ensuring that all personal information handled by us will be processed accordingly to legally compliant standards of data protection and data security.
2. The purpose of this policy is to help us achieve our data protection and data security aims by:
 - a. notifying our volunteers and users of the types of personal information that we may hold and what we do with that information;
 - b. ensuring volunteers understand our rules and the legal standards for handling personal information relating to volunteers, library users and supporters of the charity: and
 - c. clarifying the responsibilities and duties of volunteers in respect of data protection and data security.
3. This is a statement of policy only and does not form part of our volunteer agreement. We may amend this policy at any time, in our absolute discretion.

Who is responsible for data protection and data security?

4. Maintaining appropriate standards of data protection and data security is a collective task shared between all who work at the library. This policy and the rules contained in it apply to all who are involved with the gathering and processing of data held by the library, irrespective of seniority, tenure and working hours, including all volunteers, trustees and officers, consultants and contractors.
5. The Board of Trustees has overall responsibility for ensuring that all personal information is handled in compliance with the law and has appointed Dr. Chris Brown as the Data Protection Officer with day-to-day responsibility for data processing and data security.
6. All Volunteers have personal responsibility to ensure compliance with this policy, to handle all personal information consistently with the principles set out here and to ensure that measures are taken to maintain data security. Session Leaders have special responsibility for leading by example and monitoring and enforcing compliance.
7. Any breach of this policy will be taken seriously

What personal information and activities are covered by this policy?

8. This policy covers personal information:
 - a. which relates to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier
 - b. is stored electronically or on paper in a manual filing system;
 - c. in the form of statements of opinion as well as facts;
 - d. which relates to Volunteers (present, past or future) or to Library Users or supporters of the charity whose personal information we handle or control;
 - e. which we obtain, hold or store, organise, disclose or transfer, amend, retrieve, use, handle, process, transport or destroy.

What personal information do we process about Volunteers and what do we do with it?

9. We collect personal information about you which you provide, or we gather before or during your engagement with us. Within the terms of the General Data Protection Regulation (GDPR) our lawful basis for processing this data is “legitimate interests”
10. The types of personal information that we may collect, store and use about you include your:
 - a. home address and contact details including telephone number and email address
 - b. recruitment information (including your application form or cv, any references received and details of your qualifications);
 - c. information about your right to work and visa status
 - d. performance and any disciplinary matters, grievances, complaints or concerns in which you are involved.
11. We will use information to carry out our business, to administer your work or engagement and to deal with any problems or concerns you may have including:
 - a. **Volunteers Address Lists:** to compile and circulate lists of home address and contact details, to contact you outside working hours.
 - b. **Disciplinary, grievance or legal matters:** in connection with any disciplinary, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
12. We confirm that that for the purposes of the GDPR, the Charity is registered as a Data Controller of the personal information we hold. This means that we determine the purposes for which, and the manner in which, your personal information is processed.
13. We will keep you informed of the data we hold, and what we do with it, via a *privacy notice*.
14. If you consider that any information held about you is inaccurate then you should tell the

Volunteer Coordinator and, if we agree that the information is inaccurate then we will correct it. If we do not agree with the correction, then we will note your comments.

15. You may ask us to destroy any personal data we hold about you if you cease to be actively engaged as a library volunteer. This should include shredding of paper-based records if appropriate.
16. We will take reasonable steps to ensure that your personal information is kept secure, as described later in this policy and in general, we will not disclose your personal information to others outside the Charity. However, we may need to disclose personal information about Volunteers:
 - a. to comply with our legal obligations or assist in a criminal investigation or to seek legal or professional advice in relation to employment issues, which may involve disclosure to our lawyers, accountants or auditors and to legal and regulatory authorities, such as HM Revenue and Customs;
 - b. to other parties which provide products or services to us.
17. By providing your personal information to us, you consent to the use of your personal information (including any sensitive personal data) in accordance with this policy.

What personal information do we process about Library Users and what do we do with it?

18. The library has a collection of donated books, known as “yellow sticker” books, available for circulation. We collect personal information about library users which they provide, or we gather before they use this service or whilst they are using the service;
19. The types of personal information that we may collect, store and use about library users includes:
 - a. Sheffield City Council library number
 - b. Postcode
 - c. email address and marketing permissions
 - d. items borrowed, money owed, notes (free text) and alerts
20. We will use information to administer your service including:
 - a. **Renew Item and Overdue Item Alerts e.g.** send you emails when items need to be renewed or are overdue and fines may need to be paid
 - b. **Email Newsletter** to update you about events and activities at the library, fundraising or other news that we see relevant, where you have given us consent.
 - c. **Complaints, grievance or legal matters:** in connection with any complaints, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
 - d. **Service Monitoring:** to conduct monitoring for service management purposes and to publish

anonymised, aggregated information about the breakdown of the Library's users.

21. We confirm that that for the purposes of the GDPR, the Charity is a Data Controller of personal information. This means that we determine the purposes for which, and the manner in which, your personal information is processed.
22. We will keep you informed of the data we hold, and what we do with it, via a *privacy notice*.
23. If you consider that any information held about you is inaccurate then you should tell a library volunteer or the Data Protection Officer and, if we agree that the information is inaccurate then we will correct it. If we do not agree with the correction, then we will note your comments.
24. You may ask us to destroy any personal data we hold about you if you cease to be a user of the yellow sticker loan service. This should include shredding of paper-based records if appropriate.
25. We will take reasonable steps to ensure that your personal information is kept secure, as described later in this policy and in general, we will not disclose your personal information to others outside the Charity. However, we may need to disclose personal information about library users:
 - a. to comply with our legal obligations or assist in a criminal investigation
 - b. to other parties which provide products or services to us.
26. By providing your personal information to us, you consent to the use of your personal information (including any sensitive personal data) in accordance with this policy.

What personal information do we process about Charity Supporters and what do we do with it?

27. We collect personal information about charity supporters which:
 - a. they provide, or we gather before they support our charity Friends of Greenhill Library or whilst they are supporting our charity;
28. The types of personal information that we may collect, store and use about charity supporters includes:
 - a. home address and contact details
 - b. email address and telephone number
 - c. records of payment methods and payments made to the Friends of Greenhill Library
29. We will use this information to carry out our business and to deal with any problems or concerns supporters may have including:
 - a. **Renew Friends of Greenhill Library membership e.g.** send emails when membership is coming to an end to remind supporters to renew their membership
 - b. **Email Newsletter** to update supporters about events and activities at the library, invite them

to the charity's AGM, fundraising or other news that we see relevant, where they have given us marketing consent.

c. **Complaints, grievance or legal:** in connection with any complaints, grievance, legal, regulatory or compliance matters or proceedings that may involve the supporter.

d. **Service Monitoring:** to conduct monitoring for service management purposes and to publish anonymised, aggregated information about the breakdown of the charity supporters

30. We confirm that that for the purposes of the GDPR, the Charity is a Data Controller of personal information. This means that we determine the purposes for which, and the manner in which, personal information is processed.

31. If a supporter considers that any information held about them is inaccurate then they should tell a library volunteer or the Data Protection Officer and, if we agree that the information is inaccurate then we will correct it. If we do not agree with the correction, then we will note their comments.

32. Supporters may ask us to destroy any personal data we hold about them if they cease to be a supporter of the library. This should include shredding of paper-based records if appropriate.

33. We will take reasonable steps to ensure that personal information is kept secure, as described later in this policy and in general, we will not disclose personal information to others outside the Charity. However, we may need to disclose personal information about charity supporters:

- a. to comply with our legal obligations or assist in a criminal investigation
- b. to other parties which provide products or services to us.

34. By providing their personal information to us, supporters consent to the use of their personal information (including any sensitive personal data) in accordance with this policy.

Data Protection Principles.

35. Volunteers whose work involves using personal data relating to volunteers, library users or others must comply with this policy and with the GDPR's data protection principles which require that personal information is:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f. processed in a manner that ensures appropriate security of the personal data, including

protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

We must always have a lawful basis to process personal information. In most (but not all) cases, the person to whom the information relates (the Subject) must have given consent. The Subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.

Data security and Volunteer Training

36. We must all protect personal information in our possession from being accessed, lost, deleted or damaged unlawfully or without proper authorisation through the use of data security measures.
37. Maintaining data security means making sure that:
 - a. only people who are authorised to use the information can access it;
 - b. information is accurate and suitable for the purpose for which it is processed; and
 - c. authorised persons can access information if they need it for authorised purposes. **Personal information therefore should not be stored on individual computers** but instead on our central system.
38. We will undertake training to ensure that all volunteers with access to personal data understand what is expected of them in order to comply with the provisions of the GDPR. This includes:
 - a. Any desk or cupboard containing confidential information must be kept locked.
 - b. Personal information stored on computers should only be accessed from staff computers within the library. It should not be copied onto memory sticks or other removable media, sent via email, or kept on users' machines at home.
 - c. Computers should be locked with a password or shut down when they are left unattended
 - d. Passwords should not be displayed in any public area of the library and should never be passed on to others unless they need to know them to fulfil their assigned duties at the library.
 - e. Care should be used when viewing personal information on a monitor to ensure that it is not visible to others.
 - f. Care should be used when discussing personal information face-to-face or over the telephone, to ensure it cannot be overheard by others.
 - g. Volunteers should report to the shift leader if they see any person they do not recognise in the office.
 - h. **Telephone Precautions.** Particular care must be taken by Volunteers who deal with telephone enquiries to avoid inappropriate disclosures. In particular: The identity of any telephone caller must be verified before any personal information is disclosed. If the caller's identity cannot be verified satisfactorily then they should be asked to put their query in writing. Volunteers should not allow callers to bully them into disclosing information. In case of any problems or uncertainty, contact the Data Protection Officer.

39. **Methods of disposal.** Copies of personal information, whether on paper or on any physical storage device, must be physically destroyed when they are no longer needed. Paper documents should be shredded and CDs or memory sticks or similar should not be used.

Subject access requests

40. By law, any Subject (including Volunteers and Library Users) may make a formal request for information that we hold about them, provided that certain conditions are met. The request must be made in writing. A fee is payable by the data subject for provision of this information. In some circumstances it may not be possible to release the information about the Subject to them, for example if it contains personal data about another person.

41. Any volunteer who receives a written request should forward it to the Data Protection Officer immediately.