

Friends of Greenhill Library

Confidentiality, Data Protection and Data Security Policy

Created by: Chris Brown. Last revised 27-09-2020. Approved by the Board 07/10/2020

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 according to legally compliant standards of data protection and data security.
2. The purpose of this policy is to help us achieve our confidentiality, 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. making clear the responsibilities and duties of volunteers in respect of data protection and data security.
3. Under the terms of the GDPR (General Data Protection Regulations) our lawful basis for processing personal data is "legitimate interests", except for our e-newsletter mailing list, for which the lawful basis is "consent"

(References to GDPR in this document refer to the EU data protection regulations in force until such time as UK legislation comes into force following the end of the transitional withdrawal period from the EU, at which point they will refer to the UK legislation.)

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. This responsibility continues after volunteers ends their involvement with the organisation. Session Leaders have special responsibility for leading by example and monitoring and enforcing compliance. All volunteers with access to confidential data must sign a confidentiality agreement.
7. The volunteer co-ordinator is responsible for ensuring that all new volunteers with access to confidential data sign the confidentiality agreement and receive appropriate training.
8. Any breach of this policy will be taken seriously

What personal information and activities are covered by this policy?

9. 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.
10. This policy also covers non-personal information which should be treated as commercially confidential and which has not already been made public.

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

11. We collect personal information about you which you provide, or we gather before or during your engagement with us. This information is stored in a web-based service called “Three Rings” and is protected by a password-based login and a system of role-based privileges. It is accessible to a limited number of people, namely the operations manager, the volunteer co-ordinator, the secretary, the chairman and the vice chairman.
12. 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. role(s) within the library; for example Session Leader, Fundraiser or Library Assistant
 - d. performance and any disciplinary matters, grievances, complaints or concerns in which you are involved.

13. We will use information to manage the front-desk rota and contact you about library operational issues and about events for which we need volunteer help and, exceptionally, to deal with any problems or concerns you may have such as any disciplinary, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
14. 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.
15. 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.
16. 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.
17. 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.
18. 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?

19. 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. This information is stored in a web-based library management system called Koha and is protected by a password-based login. It is visible to front-desk volunteers working at the library and certain other volunteers with administrative roles within the library.
20. The types of personal information that we may collect, store and use about library users includes:
 - a. Sheffield City Council library card number
 - b. Postcode
 - c. email address
 - d. items borrowed, money owed, notes (free text) and alerts

21. 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. **Complaints, grievance or legal matters:** in connection with any complaints, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
 - c. **Service Monitoring:** to conduct monitoring for service management purposes and to publish anonymised, aggregated information about the breakdown of the Library's users.
22. We hold a mailing list of people containing their names and email addresses. This information is stored and used by a mail delivery service called Mailchimp. It is used to distribute a monthly e-newsletter with details of the library's news, events and services, and occasionally to distribute notifications of special events. Everyone on this list has given explicit consent to receive the newsletter. All emails sent out by Mailchimp include an "unsubscribe" link allowing recipients to remove themselves from the list.
23. During the coronavirus pandemic we capture contact information (name and phone number) of all members of the public entering the library to support "Test and Trace". This information is recorded on paper and stored in a locked cabinet. It is shredded after 21 days.
24. We record CCTV images from four cameras (one internal and three external) for the purposes of crime prevention and detection. The recordings are stored on CCTV equipment in the switch cabinet and are retained for 14 days. Access is controlled by restricted physical access to the equipment, plus a password-protected login
25. The library runs a number of children's groups including storytime, funtime and chatterbooks. We store contact information for parents/carers whose children attend these groups. We use it to remind them of the next session or notify them of cancellations. For storytime, the information is held on a computer in the library office in a password-protected spreadsheet. For funtime, the information is stored in an LCN "webmail" address book; access is controlled by a password-protected login.
26. 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
27. 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.
28. 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.
29. 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.

30. 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?

31. 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;

32. The types of personal information that we may collect, store, and use about charity supporters includes:

- a. name, home address, email address and telephone number
- b. records of payment methods and payments made to the Friends of Greenhill Library
- c. Consent to claim gift-aid on donations

33. 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 where necessary
- b. Invite them to the charity's AGM or distribute other news that we see relevant.
- 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

34. 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.

35. 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.

36. 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.

37. 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.

38. 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.

39. 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

40. 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.

41. 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

42. 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 should be stored either on staff computers within the library (and accessed only from those computers) or in secure web-based storage. In all cases access should be controlled via a strong password. **Personal information 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.

43. **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

- 44. 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. 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.
- 45. Any volunteer who receives a written request should forward it to the Data Protection Officer immediately.
- 46. Information held in the city council's library management system should *not* be made available as the library is not the data controller for that information. A subject access request for this information must be made to the council.

Confidentiality of non-personal data

47. As a charity, Friends of Greenhill Library generally operates in an open and transparent manner. From time to time, however, volunteers may have access to non-personal data which, although not subject to the GDPR, should be treated as confidential for other reasons. An example would be details of competitive quotes obtained from suppliers for work that the library plans to undertake. Volunteers should not disclose such information unless it has already been made

public. If there is any doubt whether an item should be treated as confidential, ask a member of the board of trustees before disclosing it.

Limits to confidentiality

48. In exceptional circumstances we may need to break confidentiality if we believe there is a real intent of serious harm or danger – for example, sexual abuse, rape, self-harm, suicidal ideation or criminal activity. Any such instance must be considered on a case-by-case basis and (if circumstances permit) approved by the Board.

Policy Feedback and Review

49. Constructive feedback on this policy is always welcome. It should be given to a member of the board of trustees.

Approved by the Board 07/10/2020, Next Review Date: Dec. 2022

Signed by Chair of the Board

A handwritten signature in blue ink, appearing to read "C. R. Brown".