

Scottish Poetry Library

PRIVACY POLICY

1. Context and overview

1.1. Introduction

The Scottish Poetry Library needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

Why this policy exists

This data protection policy ensures the Scottish Poetry Library:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

2. Data protection law

The General Data Protection Regulation (2018) describes how organisations including the Scottish Poetry Library must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper, or on other materials.

3. People risks and responsibilities

3.1 Policy scope

This policy applies to:

- The board of the Scottish Poetry Library
- The staff and volunteers of the Scottish Poetry Library
- All contractors, suppliers and other people working on behalf of the Scottish Poetry Library

It applies to all data that the Scottish Poetry Library holds relating to identifiable individuals, including pseudonymised data. It can include

- Names of individuals
- Postal addresses
- Email addresses

- IP addresses
- Telephone numbers
- ...plus any other information that makes an individual identifiable.

4. Data protection risks

This policy helps to protect the Scottish Poetry Library from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

5. Responsibilities

Everyone who works for or with the Scottish Poetry Library has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Director is ultimately responsible for ensuring that the Scottish Poetry Library meets its legal obligations.
- The Head Librarian is responsible for:
 - Keeping the Director and the board updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data the Scottish Poetry Library holds about them (also called 'subject access requests').
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The Head of Operations and Depute Director is responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services the Scottish Poetry Library is considering using to store or process data. For instance, cloud computing services.

- The Communications Manager is responsible for
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

6. General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- The Scottish Poetry Library will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.

7. Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Head of Operations and Depute Director, or Head Librarian.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason.

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printed.
- **Data printouts should be shredded and disposed of securely** when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.

- Data should only be stored on **designated drives and servers** and should only be uploaded to approved **cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

8. Data use

Personal data is of no value to Scottish Poetry Library unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the **screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically**. Please ask IT for support with this.
- Personal data should **never be transferred outside of the European Economic Area**.
- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

9. Data accuracy

The law requires the Scottish Poetry Library to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as **few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a user's details when they call.
- The Scottish Poetry Library will make it easy for data subjects to update the information the Scottish Poetry Library holds about them. For instance, via the company website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

10. Subject access requests

All individuals who are the subject of personal data held by the Scottish Poetry Library are entitled to:

- Ask **what information** the Scottish Poetry Library holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information this is called a subject access request.

Subject access requests from individuals should be made by email to the Head Librarian at Rebecca.oliva@spl.org.uk. The Head Librarian will aim to provide the relevant data within 14 days and will always verify the identity of anyone making a subject access request before handing over any information.

11. Disclosing data for other reasons

In certain circumstances, data may be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, the Scottish Poetry Library will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

12. Providing information

The Scottish Poetry Library aims to ensure that the individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

[This is available on request. A version of this statement is also available on the company's website.]

Policy prepared by: Rebecca Oliva, head Librarian

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