

Data Protection Policy

1. Introduction

The Data Protection Act 2018 ('the Act') governs the appropriate usage and storage of information about people (personal data). More information can be found about the Act at Appendix 1.

This policy states the library's approach to ensuring its compliance with the Act.

2. Personal data at the Library

The table at Appendix 2 details all known instances of collection of personal data ('personal data sets') with the exception of CCTV footage. It shows what we collect, why we collect it, how we store it securely and what the arrangements are for disposing of it when we no longer need it.

The approach to CCTV footage appears at Appendix 3.

3. Telling users and visitors about collection etc of personal data

A copy of this policy is available on the Library website.

4. Allowing individuals to access the personal data we hold about them

If an individual about whom we hold personal data asks to see this data, we must allow them to do this.

If the data needs to be corrected, we should correct it. If our holding or using the individual's data is causing them damage or distress, we must either stop holding or using it or change the way that we do so in a manner that the individual consents to.

5. Lodging a complaint

An individual about whom we hold personal data always has the right to lodge a complaint with the Information Commissioner's Office if they feel the circumstances necessitate this <https://ico.org.uk/>

6. Sharing personal data with other agencies

We will only do this where we are obliged to, in order to comply with the Act ie when we are:

- Carrying out a legal duty or as authorised by the Minister of State for data protection.
- Protecting vital interests of the individual about whom the data is held, or another person.
- The person about whom the data is held has already made the information public.
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights.
- Monitoring for equal opportunities purposes – ie race, disability or religion.
- Providing a confidential service where it has been impossible to secure consent from the person about whom the data is held or where it is reasonable to proceed without consent:

eg where we would wish to avoid forcing stressed or ill individuals to provide consent signatures.

7. Responsibilities under the Act

The Act requires us to identify who our Data Controller, Data Protection Officer and Data Processors are.

The Data Controller is the Library Management Committee. The Committee decides what personal information the Library will hold and how it will be held or used. It does this via its annual review of this data protection policy. The Committee can be contacted via secretary@barrowcommunitylibrary.org.uk

The Data Protection Officer is the chair of the Library Management Committee, who is legally responsible for complying with the Act. The Data Protection Officer is Keith Butler (07802 91642). The Data Protection Officer's responsibilities can be found at Appendix 4.

The Data Processors are the library volunteers (including individual members of the Committee).

Approved by Library Management Committee: 10 November 2025
Review date: November 2026

Appendix 1 – The Data Protection Act (2018)

This contains principles for processing personal data with which the Library will comply. Under the Act, personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and kept up to date,
5. Shall not be kept for longer than is necessary,
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Processor, which takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. 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 freedoms of data subjects in relation to the processing of personal information.

Appendix 2 – known data sets (excluding CCTV – see Appendix 3)

	Data set	What items of data we collect	Justification for collecting	Where we store the data	The arrangements for disposing of the data when we no longer need it
1	Summer reading challenge (SRC)	Registration cards with children's names only	So that we can see how many children register for the SRC plus keep a track of their three visits to complete the challenge	In a box behind the library counter	Registration cards are sent to the hub via the crates at the end of the challenge
2	100 Club	The following are kept in a spreadsheet: Name, address, number allocated, e- mail address, telephone number, status of membership payment. Members' bank details are held at Unity Trust and are password protected. Roy keeps copies of winners' names each month together with the amount won, separately from the anonymous winning number announcement sheet.	So that we can identify the winners from the numbers that are drawn and can contact them to notify them. We can also then make BACS transfer payments to them.	Roy's spreadsheet, which is password-protected. The spreadsheet is sent electronically to Sally each month. Sally destroys previous versions electronically and shreds any printed versions. Roy keeps a hard copy of the spreadsheet in his own office. The bank details are password-protected on the Unity Trust banking app. The original application forms are kept in a	

				locked space in the library.	
3	Awareness book (current)	Daily tasks and events	So that volunteers can see what tasks need doing each time the library is open and so volunteers can book people on to events	Kept in lockable drawer behind counter	Moved to storeroom
4	Awareness books (previous)	To look back at previous events and figures important for the annual review report each year	As above	Kept in lockable store room	Kept not disposed of
5	Data from interviewing potential volunteers	Volunteering form, names, contact telephone numbers, email addresses, preferred shifts and availability	Contact information for Three Rings and preferred days/shifts so volunteers can be put on the rota	Volunteer Coordinator's lockable cupboard in office	Shredded when volunteers leave the organisation
6	Emergency Contact Form	Names, telephone numbers, email addresses, any medical issues, emergency contact details of family or friends	In case of emergency	Kept in lockable drawer behind counter	Shredded when a volunteer leaves the organisation
7	Home deliveries	Home delivery file, library card number and PIN, contact telephone number, address, preferred authors.	To order books for home delivery via the LCC	Kept in lockable space in the library	Destroyed when home delivery no longer required
8	Mr Boardman's file	Library card number and PIN, telephone number, list of books to be put on hold	To order books to be delivered to the library via the LCC	Kept in lockable drawer behind counter	No need to get rid of this
9	Data held on Three Rings	Names, gender, telephone numbers, addresses, preferred shifts, roles, date joined	To be able to put volunteers on the rota and have their contact details for use	Three Rings online	Volunteers' information is deleted from Three Rings when they leave the organisation

10	Sewing Workshops Book	Name and telephone numbers	To book people on to the sewing workshops	Kept in lockable drawer behind counter	No need to get rid of this
11	Training folder	Volunteers' names	Training information for the two training sessions given to new volunteers	Shelf under till	Shredded when a volunteer leaves the organisation
12	Library membership personal information	Personal data of people who have applied to join Leicestershire County Council libraries. Library card number Name Address Date of birth Telephone number Mobile phone number email address Signature and date. Then if the member is under 16: Parent / Care name, address, telephone, mobile, email and signature. There are also tick boxes for whether the member wants publicity, and whether the member is 1) a senior citizen 2) full time student 3) unwaged.	To enable the new joiner to be entered onto the library management system	This information is on paper and stored at the library in a locked drawer for up to 7 days before being sent to the Loughborough Hub.	Once the forms have been sent to the hub we no longer have access to the data either hard copy or on the library management system.
13	Copy thank you receipts to donors	Name of donor	To keep track of who has donated which sums and when.	Locked drawer behind the counter.	These need to be detained for as long as our other financial records.

14	Records of safeguarding incidents	Whatever information arose as a result of our recording of the incident (for historic instances) or a copy of the completed Safeguarding concerns report form, together with any other pertinent information as required by our safeguarding policies.	To maintain a full record of any safeguarding incident, as required by our safeguarding policies.	In a sealed envelope in the locked cupboard in the Coordinator of Volunteers' office	Seven years
15	Completed photo consent forms	Name of child and contact details of parent / guardian; name of adult plus contact details	So that we do not have to keep asking for permission	Locked drawer behind counter	One year

Appendix 3 - usage of CCTV

The justification for CCTV at the Library

To record any criminal activity in the library, and any disputes between volunteers and customers.

To record activity in the car park including any accidents.

CCTV cameras on Library premises

We have seven cameras, four inside the library and three outside. One shows the car park entrance and two show the car park itself.

There are no cameras in any of the toilet, the kitchen, the kitchen corridor or the office.

CCTV footage

The footage is video only ie with no sound and is stored for 30 days before being automatically deleted.

It is stored on the local CCTV hard drive.

Accessing the recorded video footage

Access to the recorded video is via the CCTV console and requires the admin password.

The following individuals have the password:

- Angeline Kazianis
- Keith Butler
- Nick Thomas (for when Keith is on leave)

This list is reviewed at least annually.

If any individual who has access to the recorded video footage ceases to be a library volunteer, the permission must be removed and / or the password changed.

The password is changed every 12 months on 1 October.

Accessing the live video footage

The live video can be accessed remotely using a tablet or smart phone via the Homesafe View app.

The following individuals have access to the live footage:

- Angeline Kazianis
- Keith Butler
- Ceri Fairbrother

This list is reviewed at least annually.

If any individual who has access to the recorded video footage ceases to be a library volunteer, the permission must be removed and / or the password changed.

The password is changed every 12 months on 1 October.

It is not appropriate to view live video remotely when the library is open during library opening hours or when hirings are taking place.

Access for the nominated persons to remotely view the live video footage is for emergency calls outs for the intruder alarm, training volunteers' re unlocking and locking procedures, checking the library gates, checking car park flooding, checking shelf moving, and checking hirers' attendance.

Registration at the ICO

BUSCA is registered with the Information Commissioners Office for ICO purposes and pays a data protection fee annually.

External requests to view footage

If there is a request to see CCTV footage from the police or from a member of the public, arrange a suitable time for this to be done, taking the date and time of any incident relevant to their request and taking the contact details of the person requesting the footage.

Any member of the public can ask to view footage if it potentially includes a video of themselves. This is known as a "Subject Access Request (SAR)" as defined in the General Data Protection Regulation (GDPR). We are obliged to respond within one month.

Communicating our usage of CCTV to the public

Posters are inside and outside the library showing that the library has CCTV inside the library and in the car park.

Appendix 4 – responsibilities of the Data Protection Officer

The Data Protection Officer is responsible for ensuring that the policy is implemented and will have overall responsibility for:

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice,
- Everyone processing personal information is appropriately trained to do so,
- Everyone processing personal information is appropriately supervised,
- Anybody wanting to make enquiries about handling personal information knows what to do,
- It deals promptly and courteously with any enquiries about handling personal information,
- It describes clearly how it handles personal information,
- It will regularly review and audit the ways it holds, manages and use personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All volunteers (including management committee members) are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.