**Birkdale Community Hub & Library**

**Policy:     DATA Policy Charity No 1153611**

|  |
| --- |
| **Responsibility for Policy:                                                  Andy Webb Trustee****Relevant to:                                                                         Public and Volunteers** |
| **Approved by:                                                                   Trustee Board,** **16th February 2023** **Responsibility for Document Review:                             Secretary of BCHL****Date introduced:                                                                December  2021****Date(s) modified:                                                           16th February 2023****Next Review Date:                                                              no later than February 2026** |

**RELEVANT DOCUMENTS – None listed**

**Note:**

The data policy falls into four parts;

**Part 1** is addressed to members of the library who are registered on our library system or in our other records (eg the 200 club). It deals with how we collect, process and store data.

**Part 2** defines the Data Handling Guidelines for our volunteers

**Part 3** outlines key procedures regarding data removal

**Part 4** lists the data we hold about members

We are not registered with the ICO as we do not fall into a required category, we collect and process data on a Legitimate Interests basis.

Part 1: BIRKDALE COMMUNITY HUB AND LIBRARY
MEMBER DATA PRIVACY NOTICE

**Our contact details:**

Manager
Birkdale Community Hub and Library The Station Master’s House
2 Liverpool Road, Birkdale, Southport, PR8 4AR

Email: manager@thestationmastershouse.co.uk

Tel: 01704 566992

**The type of personal information we collect (Dated: Jan 2023):**
We currently collect and process the following personal information from members of BCHL who use our library services. We collect and process this data under Legitimate Use guidelines to provide you library and other services.

Name
Address
Email address
Telephone number
Year of Birth

Book loan data

In addition for those who are volunteers, fund raising scheme members or use our non-library facilities (eg meeting rooms) we may hold other data held to facilitate those activities.

**How we get the personal information and why we have it:**The personal information we process is provided to us directly by you to enable us to provide a community service at the Birkdale Community Hub and Library for the benefit of the public.

**We use the information that you have given us in order to:**

* administer membership records;
* Administer fund raising records (eg 200 Club)
* manage our volunteers;
* maintain our own accounts and records; and
* inform you of news, events, activities and services provided by the Birkdale Community Hub and Library.

We will not share this information with any other organisations or individuals, unless required to by law. Under the General Data Protection Regulation (GDPR), the lawful base we rely on for processing this information is your consent. You are able to remove your consent at any time. You can do this by contacting the Manager at the address given above.

**How we store your personal information:**Your information is securely stored electronically within our library management system software hosted in the cloud and within password protected documents and spreadsheets. Any paper documents are held securely, and temporary electronic or paper copies deleted once the purpose they were created for has been met. In addition email addresses are stored securely within our cloud email provider to allow us to notify you of events, AGMs, newsletters, et – you can unsubscribe at any time.

Our cloud library and email data is held within EU or UK jurisdictions.

We keep your personal information for the duration of your membership of the Birkdale Community Hub and Library. Within one month of your membership ending, either by you advising us of such in person, by letter or email or by BCHL deciding to terminate membership (e.g. for breach of Terms of Use), we will dispose of your information by permanently deleting your membership record within the library management system software and other data stores.. Volunteering specific data is deleted when the individual ceases to volunteer, the same is true for any 200 Club or Friends specific records.

**Your data protection rights:**Under data protection law, you have rights including,
Your right of access – You have the right to ask us for copies of your personal information.
Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure – You have the right to ask us to erase your personal information.
Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information.
Your right to object to processing – You have the the right to object to the processing of your personal information.
Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

**How to complain or make a request:**If you have any concerns about our use of your personal information, you can make a complaint to us at the contact details given above.

Although we are not an ICO member you can also complain to the ICO if you are unhappy with how we have used your data. The ICO’s address:
Information Commissioner’s Office
Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF
Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

Part 2: DATA HANDLING GUILDELINES

FOR BCHL VOLUNTEERS

As a BCHL volunteer in any capacity – at one of our sites, using the library system, fund raising, promoting the charity in the media, a trustee, etc – we need to treat personal data we handle securely. Please follow the guidelines below:

* Data should only used for BCHL purposes and personal details should not be made publicly available
* Electronically held data should be password protected, either as part of the system (e.g., the library system) or added explicitly (e.g. using Excel or Word passwords).
* Data held on paper must be filed away appropriately and not left out. If in one of our publicly accessible buildings (The Station Master’s House and Birkdale Methodist Church Library) paper documents with member data should be stored securely in a locked drawer or box.
* Any temporary extracts (e.g., an export from the library system) or copies of member data must be similarly handled. They should not be held permanently but deleted or destroyed once they have been used for the intended purpose
* If using a PC with access to member data, Windows should be locked if the user will be away from the desk.

Part 3: DATA HANDLING PROCEDURES

Although several of the charity’s procedures refer to collection and processing of member (e.g. new member registration) and other data for the organisation, the procedures below are specifically data focussed

1. **Removal of closed memberships from electronic and paper records**

In our Member Privacy Notice we commit to removing a member’s data from our records within one month of being notified. For any volunteer receiving a request to remove a member’s records please forward the request to one of the managers or a trustee who will pass to the following for action (names correct at Jan 2023):

IT Trustee (Andy Webb)

* Removal of member records from Ionos and/or SendinBlue and Excel email stores, and from Skedda meeting room system.

Manager (Tim Hall)

* Shredding of original registration filed at BMC

Library System Administrator (Lindsey Martin)

* Removal of member records from SLLS

Volunteer Administrator (Linda Morris)

* Removal of member records from volunteering records (also when a volunteer stops volunteering but remains a member)

200 Club Administrator (Chrissy Gadd)

* Removal of member records from 200 club records

Friends Administrator (Seonaid McNabb)

* Removal of member records from Friends Records
1. **Dormant member processing**

Once per year an extract of members who have not borrowed a book in three years should be taken by the Library System Administrator so that we are not retaining redundant data by default. The extract of names should be checked against activity in Skedda to make sure that the member isn’t someone who uses our room facilities but not the library.

After that the member will be contacted by email or phone to check that they still want to be a member, and if not the removal of closed membership procedure should be followed.

Part 4: Member Data Held by Birkdale Community Hub & Library

A member in this context is anyone we hold records about. Most will be on the SLLS library system but some are not. Some supporters are happy to contribute funds (e.g. Friends) but are not book lending members of the library.

As of Jan 2023 Date of Birth is held for children and no process exists to convert that to Year of Birth (YOB) on age 18. The trustees have agreed only YOB will be held, a one-off exercise is needed to converts any DOBs to YOBs.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|   | **SLLS Library System** | **Volunteers** | **Email Lists** | **200 Club** | **Friends** |
| **First Name** | Y | Y | Y | Y | Y |
| **Surname** | Y | Y | Y | Y | Y |
| **Address** | Y | Y |  | Y |  |
| **Email** | Y | Y | Y | Y | Y |
| **Phone Number** | Y | Y |  | Y |  |
| **Year of Birth** | Y | Y |  |  |  |
| **Book Loan History** | Y |  |  |  |  |
| **Member Type Indicator (Library, 200 Club, Friends, Volunteer, Trustee, Voting member)** |  |  | Y |  | Y |
| **DBS checks status** |  | Y |  |  |  |
| **Gift Aid indicator** |  |  |  | Y | Y |
| **Date of membership** |  |  |  | Y | Y |
| **Bank details** |  |  |  | Y |  |