



LIB No: LIB12

Kettering General Hospital Library Services

Privacy/Fair Processing Notice

Margaret Theaker Knowledge & Library Service Manager May 2018





This notice sets out the basis on which Library Services at Kettering General Hospital collects and uses the personal data of our users.

Our users include, and accordingly this privacy policy applies to:

Kettering General Hospital NHS Foundation Trust (KGH) staff
Northamptonshire Healthcare NHS Foundation Trust (NHFT) staff
Northampton General Hospital NHS staff
Students on placement at KGH
GP Services in our local area
Other East Midlands NHS staff
Northamptonshire council staff
GP Trainees on the NHS training scheme
Retired NHS staff (who wish to remain members)
PTFS (Library Management System hosts) staff
Local hospice centres staff members
Those who have paid for limited access KGH Library membership
Members of the public
Any other members who have signed to become a KGH Library member

Until 24 May 2018 the KGH Library Service shall process your personal data in accordance with the Data Protection Act 1998 (DPA) and in accordance with the Trust's <u>Data Protection Policy</u>. From 25 May 2018, the KGH Library Service shall process your personal data in accordance with the General Data Protection Regulations (GDPR).

Throughout this notice, "KGH Library", "we", "our" and "us" refers to Library Services at Kettering General Hospital. "Trust" means Kettering General Hospital NHS Foundation Trust. "You" and "your" refers to our users as listed above who use or express an interest in using our services.

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Personal information we hold about you

We may collect and process the following data about you:

- Name
- Contact details both personal and work addresses, email addresses, phone numbers
- Library membership number
- Job/Role
- Department
- Trust/Organisation
- Course name
- Course completion date
- Library joining and leaving dates
- 24/7 Library access permissions
- History of library usage e.g. items borrowed and requested, search requests, training given.
- Feedback responses e.g. from surveys and user studies
- Username and password for Library account access staff are not able to view your password, however we can change it on your behalf if you have forgotten it but will always advise that you log in and amended it to one of your own choosing.
- Any applicable account notes
- Disability information (to ensure we provide the best service possible to our members by amending loan periods or trying to provide information in another format)
- For KnowledgeShare members in addition to the above we shall also hold:
 - o Athens username
 - o Athens Unique Identifier
 - o Professional interests

How we collect personal information about you

We collect most of the personal information we hold about you:

- Membership application forms
- Via our online forms
- Application forms for other services we offer i.e. KnowledgeShare, Athens
- In person at the library issue desk
- In the course of providing our services to you (e.g. history of library usage) or after we have provided services to you (e.g. feedback responses).

How we use the information we hold about you and the legal basis for processing your data under GDPR

We need the information listed above (see *Information we hold about you*) primarily to allow us to perform our contract with you. On many occasions we will process your data to enable KGH Library to meet its commitments to you. In some cases we may use your personal information to pursue a legitimate interest of our own or of a third party (for example - another Trust department i.e. Finance, Payroll, KnowledgeShare, NHS OpenAthens, PTFS) provided your interests and fundamental rights do not override that interest. The "legitimate interest" is generally the interest of KGH Library (or a third party) in providing or supporting the provision of library services. The situations in which we will process your personal information are listed below.

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We use the information we hold about you:

- to give you access to library buildings
- to send alerts/notifications for loans due for return or overdue
- to send alerts/notifications for journal articles and contents pages
- to arrange for your overdue account to be salaried or invoiced.
- to provide and administer library services e.g. borrowing and requesting items, booking rooms and training sessions
- to provide you with access to e-books, e-journals and databases.
- to respond to enquiries and interlibrary loan requests
- to manage academic reading lists
- to gather usage statistics
- for the continuous improvement of library services
- to let you know about the services and resources that Library Services provide to NHS users (NHS users only)
- to gather feedback on the performance of the library in general by way of an annual survey, evaluation requests after services have been provided.

Change of purpose:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who we share your information with

All library users must comply with the <u>library regulations (link to these)</u>. If you do not abide by our regulations we may share your personal data with your Departmental Manager, your University/College Deans Office, Trust/Organisation HR, Finance, IT Department, the Trust's payroll provider.

We may also use your data to provide information about your library usage to your university or your Trust/Organisation.

We do not pass your data to third party e-book, e-journal, database, reference management software or booking service providers. Where a third party service provider requires you to create an account, your contract is with that provider and your data is stored by them, not by KGH.

Where access to e-books, e-journals and databases is via UK Federation, OpenAthens or KGH username and password your data will be anonymous at the point of use of the third party service.

Your feedback may be used anonymously for marketing purposes – e.g. from a comments form you have completed or a survey completed on Survey Monkey.

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Information security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights as a data subject

You have the right to:

- withdraw consent where that is the legal basis of our processing
- access your personal data that we process, see 'Access to the information we hold about you' below.
- rectify inaccuracies in personal data that we hold about you
- be forgotten i.e. for your details to be removed from systems that we use to process your personal data
- restrict the processing of your data in certain ways
- obtain a copy of your data
- object to certain processing of your personal data by us

For further information see the <u>Information Commissioner's Office</u> or contact KGH Data Protection Officer. You have a right to complain to the <u>Information Commissioner's Office</u> about the way in which we process your personal data.

How long we keep your information for

Your information is stored whilst you still have membership with us and for up to 6 years after your membership expiry date (*copyright regulations require us to keep some information for 6 years*).

Anonymous data from surveys and feedback exercises is retained for a longer period to aid year on year comparisons.

Access to the information we hold about you

For access to your library account sign in to 'your account' online (see a member of the library team for details on how to access). You will be able to see the contact information we hold about you and your borrowing history.

If you wish to request copies of the data we hold about you please contact us via library.index@kgh.nhs.uk.

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Data Protection Officer

The KGH Data Protection Officer will oversee compliance of this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at:

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You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.