**Museum of Richmond**

**Information Security Policy**

Incorporating Data Protection

Version 2.3, 4th December 2019

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# Definitions

**Personal Data** is covered by Data Protection legislation. This includes: postal addresses; telephone numbers; email addresses; financial information (e.g. donations and subscriptions); HR information (e.g. staff reviews and CVs). A more comprehensive definition can be found on the ICO website at the link below:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

There is a register of personal data which can be found at the end of this document

The **Data Subject** is the individual about whom information is held.

The **Data Controller** determines the purposes for which and the manner in which any personal data are, or are to be, processed. This is often the Board of Trustees for a charity

The **Data Processors** are any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

The **IT Trustee** is the Board member with specific responsibility for the use of IT in the Museum.

# Information Security

## Access and Authentication Controls

* All computers used in the Museum require a user account and password to logon. There are no Guest accounts
* Passwords are changed every 180 days and are complex, including upper and lower case letters and numbers
* User accounts are role-based. The curator and learning officer have their own personal accounts; other users – volunteers, interns, young curators, work experience placements – have shared role-based accounts (e.g. MORIntern)
* There is an administrator account on each computer, the password for which is known to the curator and the IT Trustee
* Access to data is controlled through authentication belonging to the user accounts. This is configured as follows:
  + **Personal** folders accessible only to that user account and the administrator; this includes Outlook information
  + **Public** folders accessible to all user accounts
  + **Private** folders accessible only to the curator, learning officer and administrator
  + **Archive** folders accessible only to the curator, learning officer and administrator
* All personal data is stored in the Private folders
* There are also passwords associated with each of the Outlook email accounts. These should also be complex and not shared
* Personal data is also held in eHive, the collection management system and MailChimp, the service we use to send out emails. In both cases there is a single username and password held by the Curator and LADO
* Some information relating to the Museum, including personal data, is also held on the Treasurer’s computer. This must be a computer for his/her sole use and protected by a user account and complex password, appropriate security software and backup systems

## Backup

All the files stored in the personal, public, private and archive folders are backed up off-site each day (excluding Sunday). Retention of backups is indefinite, although some files and folders may be permanently deleted in order to save storage space.

## Protection against External Threats

All the computers have Norton 360 installed. This includes a firewall together with anti-virus and anti-spam protection. The software is automatically updated and scans performed on each computer are scheduled to take place at least once a week.

Only the administrator account has full administrative privileges on each computer to reduce the risk of harmful software being installed.

The Museum itself is protected by a locked door and an alarm system. The only key holders are permanent staff members. On occasions Board members and such temporary personnel as may be required to cover the absence of permanent staff may hold keys for a brief time.

Any paper documents which contain personal information are held in a locked cupboard for which only the Curator, Learning Officer and Projects Officer (temporary role only) have keys.

The Wi-Fi router used by the Museum’s laptops is secured by an access key with encryption.

No computers other than those owned by the Museum, or explicitly approved by the IT Trustee, may be connected to the local area network.

## Computer Use Policies

* The computers are only to be used for purposes related to the Museum
* Passwords are not to be shared except where the account itself is shared (e.g. between the volunteers)
* Passwords are to be changed in a systematic fashion every 180 days and should always be complex
* Personal data is not to be transmitted off-site either by email or through the use of removable media
* Personal data should not be passed to any 3rd Party, with the exception of:
  + Payroll agency – necessary information for staff members only
  + HMRC – information required for PAYE
  + Companies House – information required relating to the Directors
  + Charity Commission – information required relating to the Trustees
  + Museum’s bank – information required relating to account signatories
* Any breaches in security or warning messages generated by the computers should be notified immediately to the IT Trustee

# Data Protection

## Roles

**Data Controller**

The Board of the Museum acts as the data controller. Specific responsibilities are held by:

* IT Trustee – overall management of Data Protection compliance
* Learning officer – day-to-day responsibility for ensuring that personal data is handled appropriately, in accordance with this policy

**Data Processors**

The data processors are any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

|  |  |  |
| --- | --- | --- |
| **Role/Person** | **Data Processor?** | **Note** |
| Curator | No | Employees are not data processors |
| Learning Officer | No | Employees are not data processors |
| Other paid staff | No | Employees are not data processors |
| Volunteers | No | Volunteers working for the Museum are not data processors |
| Board members | No | Volunteers working for the Museum are not data processors |
| Payroll agency | Yes |  |

## Policy

* Only personal data which is essential to the specific purpose should be retained. In the case of volunteers, Patrons and Board members this is limited to contact information. For supporters this is extended to a record of subscriptions and donations
* Sensitive personal data (as defined by GDPR legislation) should not be retained without the consent both of the data subject and any requirement for this should first be agreed with the IT Trustee. This data is collected through visitor Feedback Forms, which are collated into spreadsheets and the original forms shredded with no way to trace back to the individual. Friends diversity data is also collected, collated separately from identifying information and then shredded.
* Duplication of personal data should be avoided so far as possible. For example, email distribution lists should only be stored within the Mail Chimp system
* Personal data which is deemed to be “inactive” will not be retained for more than 5 years past the last active use. For example, information about a supporter whose membership has lapsed will not be retained for more than 5 years
* Personal data will be updated whenever information is received that indicates a change
* Paper records containing personal data will be kept in a locked, secure location and will be subject to the same retention rules as electronic data. Accession records and entry paperwork are retained indefinitely and are kept in a locked filing cabinet – to which only the Curator has access
* Paper records which reach their retention date will be shredded and disposed of appropriately
* Any subject access request will be referred immediately to the Board
* Communication to specific individuals regarding the activities of the Museum, including any fundraising requests will be controlled as follows (in accordance with the Privacy and Electronic Communications Regulations):
  + Supporters will be given the opportunity to opt out of such communications at the time of becoming a supporter or on the annual renewal
  + Every email that is sent to either paid-up supporters or those who have expressed a wish to be kept informed about the Museum will include the facility to opt out of any future communications
  + Telephone calls will only be made in response to specific requests for information
  + It is assumed that Board members and Patrons are content to receive communications from the Museum
  + A privacy statement is available on the Museum website outlining the purposes for which personal data is kept

# Museum of Richmond Privacy Policy

1. We are committed to protecting the privacy and the confidentiality of the personal information of visitors, supporters and volunteers. We undertake to ensure that all personal information in our possession is processed in accordance with the principles of the Data Protection Act 1998.
2. We collect personal information (your name and contact details) that you supply to us. Your information is collected when you make loans of Museum artefacts, request information from us, join one of our Friends or supporters schemes, contact us or make a booking with us. We will update your information whenever we get the opportunity to keep it current, accurate and complete.
3. Any information you provide will be used for the Museum’s purposes only. We will not pass on your information to any third party unless required by law or regulatory obligations. The information will be used to allow us to keep you informed about events and exhibitions at the Museum. It may also be used in fundraising communications.
4. You may indicate your preference for receiving direct marketing by telephone or email from us. You will be given the opportunity on every communication we send you to indicate that you no longer wish to receive our direct marketing material. Once properly notified by you, we will take steps to stop using your information in this way.
5. Credit or debit card information provided when purchasing tickets or other items from us or intermediaries such as Eventbrite is not stored by us.
6. You have the right to ask in writing for a copy of the information we hold about you and to correct any inaccuracies in your information.

# Register of Personal Data

## Electronic Sources

|  |  |  |  |
| --- | --- | --- | --- |
| **Data subjects** | **Information held** | **Where** | **Justification for holding data [[1]](#footnote-1)** |
| Permanent staff | Name, address, contact details | Private folders  Treasurer’s computer | Contract |
| Payroll information | Payroll agency (external) system  Treasurer’s computer | Contract |
| Staff reviews | Private folders | Legitimate interest  Contract |
| CVs | Private folders | Legitimate interest |
| Formal staff communications | Private folders  Treasurer’s computer (where relevant) | Contract  Legal |
| Temporary (paid) staff | Name, address, contact details | Private folders | Contract |
| Payroll information | Payroll agency (external) system  Treasurer’s computer | Contract |
| Volunteers | Name, address, contact details | Private folders | Legitimate interest  Consent |
| Supporters (belonging to membership scheme) | Name, address, contact details | Supporter database/spreadsheet in Private folders | Legitimate interest |
| Payments made to scheme | Treasurer’s computer (accounts)  Supporter database/spreadsheet and monthly accounts spreadsheet in Private folders | Legitimate interest |
| Email address | Supporter database/spreadsheet in Private folders | Consent |
| Donors (financial) | Donations made by cheque or direct bank transfer | Treasurer’s computer (accounts)  Monthly accounts spreadsheet in Private folders | Legitimate interest |
| Names, address, contact details (where supplied by the donor, including anyone who gives via CAF Donate) | Donor database/spreadsheet in Private folders | Legitimate interest |
| Gift Aid forms including name and address | Treasurer’s computer (for making Gift Aid claims) |  |
| Donors of loaned or gifted artefacts | Names, address, contact details (where supplied by the donor) | eHive data repository | Legitimate interest |
| Event attenders | Email address | Updated in Mail Chimp system – no records kept once uploaded; can unsubscribe  Eventbrite bookings – no personal information is held on our systems | Legitimate interest |
| Board members | Name, address, contact details | Private folders | Consent |
| Patrons | Name, address, contact details | Private folders | Legitimate interest |
| Benefactors | Name, address, contact details  Records of donations | Private folder  Treasurer’s computer (accounts) | Legitimate interest |
| Marketing Contacts | Name, address, contact details | Private folder | Consent |

## Paper Sources

|  |  |  |
| --- | --- | --- |
| **Data subjects** | **Information held** | **Justification for holding data [[2]](#footnote-2)** |
| Supporters | Name, address, contact details on original application and renewal forms. These are scanned and shredded so only retained very briefly in paper form | Legitimate interest |
| Volunteers | Name, address, contact details and other information provided on application forms | Legitimate interest |
| Donors | Gift Aid forms including name and address |  |
| Visitors and participants in events and workshops, notably children | Photo permission forms | Legal |
| Visitors | Feedback forms  These are entered into our systems with any personal information removed and then shredded. | Legitimate interest |
| Object donors | Paperwork associated with artefacts loaned or gifted to the Museum | Legitimate interest |

## Lawfulness of Processing Conditions

1. **Consent** of the data subject

2. Processing is necessary for the performance of a **contract** with the data subject or to take steps to enter into a contract

3. Processing is necessary for compliance with a **legal** obligation

4. Processing is necessary to protect the **vital interests** of a data subject or another person

5. Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller

6. Necessary for the purposes of **legitimate interests** pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

1. See Lawfulness of Processing Conditions [↑](#footnote-ref-1)
2. See Lawfulness of Processing Conditions [↑](#footnote-ref-2)