Privacy Notice for Harrow Library Service

This Privacy Notice broadly explains what information we collect in order to deliver library services to you. The notice will explain the purpose for processing, categories of personal information and who we may share it with. It applies to all personal information collected for or on behalf of the council whether by letter, email, face-to-face, telephone, online or any other method.

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, Harrow Library Service has decided to collect and keep a limited record of customers who come into the library to use a public computer, for the purpose of contract tracing.

To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the council has provided or contact the department directly to ask about your personal circumstances.

Purpose for processing your information

For the delivery of Library services you are required to register a membership with our service. Registering as a member of Harrow Library Service gives access to stock in Harrow and all The Library Consortium authorities, access to computers, printing, library events and activities. Information is required to set up membership on the library database allowing access to facilities. We also use your details to manage borrowed stock, and to contact you about items that you have reserved, and the return of overdue items.

By maintaining records of customers who use a public computer and sharing these with NHS Test and Trace where requested, we should be able to help NHS Test and Trace to help identify people who may have been in contact with the virus and help minimise the onward spread of COVID-19. This could help contain clusters or outbreaks.

We collect the following information:

Library members details including:

Name, address, phone, DOB, parent/guardian, payment details including payments that are outstanding.

Optional: monitoring information, agreement to receive marketing information

To support NHS Test and Trace manual records of the following information will be collected:

Name, Library Membership Number, date and time, public library computer number, and a record if the computer user had been accompanied by another individual where appropriate.

This information is only used for the intended purpose but if we intend to use it for any other purpose; we will normally ask you first. In some cases, the Council may use your information for another purpose if it has a legal duty to do so, to provide a complete service to you, to prevent and detect fraud, or if there is a risk of serious harm or threat to life.

How we collect your information

We collect your information face-to-face when visiting a library to enroll as a member. Alternatively you can register online and collect your membership card on your first visit to the library.

Information from library public computer users to support NHS Test and Trace will be taken over the telephone or face-to-face when visiting a library.

Who the information is shared with

Library Management System provider. This is shared with other library authorities who are members of the London Libraries Consortium.

We will sometimes need to share information between Council departments and services as well as other organisations such as our partners, third party contractors, government bodies, the police, health and social care organisations, housing associations, landlords and educational establishments.

Information collected for NHS Test and Trace will only be shared with NHS Test and Trace if it is specifically requested by them. For example, if another customer at the library reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of customer details for a particular time period. Information collect for NHS Test and Trace will not be used for other purposes (such as surveillance of an individual's movements or marketing activities), and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (e.g. as a result of receiving a court order).

We will only share information with these organisations where it is appropriate and legal to do so. We may also share information, for example, if there is a risk of serious harm or threat to life, for the prevention and detection of fraud or crime, assessment of any tax or duty or if we are required to do so by any court or law. Where this is necessary, we are required to comply with all aspects of the General Data Protection Regulation.

How long do we keep your information?

Records are maintained on the library database while you are an active library user. Accounts and records are deleted after a period of 2 years inactivity, where there are outstanding loans or amounts owing in your account this is extended to 10 years.

NHS Test and Trace have asked us to retain the information collected for NHS Test and Trace for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. Information collected for NHS Test and Trace will be destroyed by us 21 days after the date of your visit. Further information can be found by <u>following this link</u>

Your rights and access to your information

You have the right to request a copy of the information that we hold about you.

The new General Data Protection Regulation also gives you additional rights about the information we hold about you and how we use it, including the right to:

- Withdraw consent and the right to object and restrict further processing of your data; however, this may affect service delivery to you.
- Request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it.
- Request your data to be rectified if it is inaccurate or incomplete
- Have your data transferred or copied should you move to another authority
- Not be subject to automated decision-making including profiling

To submit a Subject Access Request visit our request page.

If you do not wish your contact information to be collected and passed to NHS Test and Trace if requested, please speak to The Library Supervisor on duty

If you have any concerns

Please contact us if you would like to know more about the information we hold about you and how we use it:

dpo@harrow.gov.uk

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You have a right to complain to us if you think we have not complied with our obligation for handling your personal information; please visit our <u>Compliments and Complaints</u> page.

If you are not satisfied with the Council's response you have a right to complain to the Information Commissioner's Office (ICO). You can report a concern by visiting the ICO website.

Changes in your circumstances

You must notify us immediately if there are any changes in your circumstances and personal details so we can maintain an accurate and up to date record of your information.