

Title: TPM Data Protection Policy
Author: Jenny Willis
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The Postal Museum Data Protection Policy

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Background

The amount of personal information about individuals which is held by people and companies has increased greatly in recent years. The Data Protection Act 1998 ('the DPA') sets out the rules for how personal information about living individuals should be held and used, particularly sensitive data such as gender, racial or ethnic origin. The DPA also gives individuals the right to find out what personal data is held about them either electronically or in a relevant filing system, and to see and correct personal data held.

This personal data must be dealt with properly however it is collected, recorded and used whether on paper, in a computer, or recorded on other material - and there are safeguards to ensure this in the Data Protection Act 1998. The 1998 Act provides for wider access to data than the previous 1984 Act, covering both electronic and some manually-held data. The Freedom of Information Act 2000 ('the FOI Act') has amended the 1998 DPA, and the DPA now covers both structured and unstructured manual records.

1 The Postal Museum context

The Postal Museum needs to collect and use certain types of information about people with whom it deals in order to operate:

- visitors to the museum and to Mail Rail, for a range of purposes including processing purchases, marketing, answering enquiries, responding to feedback, and keeping them informed of future events
- enquirers who want specific questions answered, these people may not visit in person
- donors of material that enters into the museum and archive collections of the organisation. Also, those who borrow elements of the collections for various purposes
- staff and volunteers who carry out work for The Postal Museum, for recruitment and equal opportunities monitoring, payroll and performance review
- donors and members who support the work of The Postal Museum, for managing relationships
- external stakeholders including suppliers, contractors and other third parties who carry out work on behalf of The Postal Museum such as payroll administration or database management

In this context, The Postal Museum is known under the DPA as the 'data controller' and third parties who process personal data on our behalf are known as 'data processors'.

Information is fundamental to the operations of The Postal Museum and it is essential that information is handled effectively and reliably. The Postal Museum is committed to operating in accordance with relevant legislation and to ensuring staff are appropriately trained and supported to achieve this. We regard the lawful and

correct treatment of personal information as very important to successful operations, and to maintaining confidence between ourselves and all those with whom we deal. We ensure that The Postal Museum and our trusted third parties treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the eight Principles of data protection, as set out in the Data Protection Act 1998.

2 Data Protection Principles

Specifically, the eight Principles of the DPA require that personal information:

- shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
- shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- shall be accurate and, where necessary, kept up to date;
- shall not be kept for longer than is necessary for that purpose or those purposes;
- shall be processed in accordance with the rights of data subjects under the DPA (These include: the right to be informed that processing is being undertaken: the right of access to one's personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is factually inaccurate or misleading.), and that
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- 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 data.

3 Responsibilities

The Postal Museum will manage appropriately and apply strict criteria and controls to ensure that it implements the DPA in accordance with the eight data protection principles listed above, and with relevant government standards and guidance. In particular it will:

- ensure that information is collected, processed, held, transferred and disposed of appropriately, with care for its quality and security,
- ensure that the rights of people about whom information is held can be fully exercised under the DPA, including the right to access information, and

- ensure that the requirements of the DPA are considered in key decision-making processes, such as in the development of policy and procedures and the design and the implementation of information systems.

To meet these standards, the following responsibilities have been assigned.

Senior Management will:

- ensure that there are adequate resources for compliance with the DPA

The Records Management team will:

- ensure that all relevant data protection policies and procedures are kept up to date and reflect current regulations
- provide training resources and targeted support for completion of privacy impact assessments and privacy notices
- audit the processes surrounding handling of personal data on a regular basis
- raise awareness of data protection issues wherever possible

Data Protection Champions will do the following for their areas of responsibility:

- ensure that staff understand their obligations with respect to the proper handling of data and are provided with adequate training
- be accountable for ensuring that information created or received is securely stored, appropriately accessed and destroyed in line with agreed procedures designed to comply with the DPA
- maintain data quality standards and acceptable use agreements for relevant systems (such as Customer Relationship Management systems)
- ensure that data subjects are clearly informed about use of their data via privacy notices

All staff (as part of their contractual obligations to comply with data protection regulations) will:

- undertake data protection training and read all related guidance given to them
- adhere to relevant data quality standards and acceptable use agreements for relevant systems
- ensure that personal information they create, receive and maintain is accurate and up to date
- treat personal information confidentially, use it only for its stated purpose and disclose it appropriately
- report potential or suspected data breaches to their line manager within specified timeframes and in line with procedures
- escalate subject access requests within specified timeframes and in line with procedures
- complete privacy screening questions for projects they initiate and draft a privacy impact assessment if required
- comply with any data protection audits undertaken

Procedures will be issued to all staff to support this policy.

4 Monitoring

The Postal Museum will regularly monitor its performance against the Data Protection Self-Assessment Toolkit provided by the Information Commissioner's Office.

5 Rights of employees and other data subjects

The Postal Museum's Data Protection Champions can provide advice for individuals on how to request information from The Postal Museum. Upon making a request in writing (including by email), an individual data subject is entitled, within 40 days of making the request: -

- to be informed by the data controller whether it or a third party is processing that individual's personal data,
- if so, to be given a description of the data, the purpose(s) for which they are being processed and those to whom they are or may be disclosed,
- to be supplied with all the information which forms any such personal data, in permanent form, normally by way of a copy, and
- to be supplied with any information as to the source of those data.

Requests should be directed to:

Data Protection Coordinator
The Postal Museum
Phoenix Place
London
WC1X 0DA

Email: dataprotection@postalmuseum.org

The Postal Museum may charge a fee for this, which will be no more than £10. Some information held by the museum does not need to be provided to the data subject.

6 Comments and complaints

Individuals who want to comment on the way The Postal Museum deals with data protection, or to make a complaint should contact The Postal Museum using the details above.

If they are unsatisfied with the response of The Postal Museum, they are entitled to contact the Information Commissioner by visiting this webpage (<http://ico.org.uk/concerns>) and following the advice and instructions provided or by telephoning 0303 123 1113.