

## 1. Introduction

This document is an annual review of the National Library of Wales' compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Looking at the period between 1 January 2018 and 31 December 2018, it provides an overview of developments in the regulations and guidance relating to GDPR and the Data Protection Act, amendments to the Library's policies and procedures, a record of the Library's contact with the Information Commissioner, Subject Access requests received, security breaches and training and staff awareness activities.

## 2. Regulations and Guidance

2.1 During 2018, the Information Commissioner's Office issued guidance on the following:

- Legitimate interests (March 2018)
- Consent (May 2018)
- Data Protection Impact Assessments (May 2018)
- Right to be informed (May 2018)
- Automated decision making and profiling (May 2018)
- Determining what is personal data (May 2018)
- Children and the GDPR (May 2018)
- Encryption (November 2018)
- Controllers and Processors (December 2018)
- Contracts and Liabilities between controllers and processors (December 2018)
- Guide to Data Protection (DPA 2018) (December 2018)

## 3. Amendments to policies and procedures

3.1 The following policies and procedures were published on the Library's website: Standard Conditions of Contract for the Purchase of Goods and /or Services; Information Security Policy

3.2 The Library's Data Protection Policy and relevant human resources policies were updated in May to reflect the requirements of the GDPR

3.3 Privacy statements, subject access request guidelines and application form, and statement concerning the processing of sensitive data were drafted and/or updated to reflect the requirements of the GDPR

3.4 Donor Strategy (database of contacts) was cleansed and updated prior to the introduction of the GDPR in May 2018.

3.5 The Library's internal auditors, RSM, conducted an advisory audit in June; key findings will drive further work to ensure that the Library conforms to best practice.

#### **4. Contact with the Information Commissioner's Office**

4.1 The Library's entry in the Information Commissioner's Data Protection Register was renewed, The registration expires on 11 February 2020. Renewals are made by standing order, but any amendments to the registration will be notified to the Information Commissioner's Office immediately.

#### **5. Subject Access Requests**

5.1 No Subject Access Requests were received during 2018.

#### **6. Security breaches**

6.1 One incident was reported to the Information Commissioner in August which involved passwords stored in our reader services system, but confirmation was received from the Commissioner that this was not considered to be a reportable breach under GDPR. Mitigation actions were immediately put in place to ensure that such a breach did not occur again.

#### **7. Staff awareness and training**

7.1 As part of their mandatory induction to the National Library of Wales, their information packs contain print-outs of slides of presentations to the GDPR and Freedom of Information Act.

7.2 A Task and Finish Group with representatives of all departments was established to take responsibility for drafting privacy notices specific to each work area.

7.3 An information audit of personal information was undertaken and checked against the Information Asset Register and Retention Schedules; any information where we no longer have the right to store/process was deleted.

7.4 Powerpoint slides were drafted and distributed to all staff members as a guide to the GDPR. In depth staff training sessions were also held.

7.5 The Deputy Data Protection Officer is a member of the all Wales Data Protection Officers' network. Regular meetings are held, attended by the Information Commissioner's staff, where good practice is shared.