



Poileasaidh airson Dìon Dàta
Data Protection Policy

Air aontachadh le/Approved by:

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Eadar-theangachadh dearbhte le:

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1 Farsaingeachd

Tha am poileasaidh seo a' buntainn ri neach sam bith a bhios a' dèiligeadh ri fiosrachadh pearsanta às leth Bhòrd na Gàidhlig (BnG), agus dh' fhaodadh e a bhith buntainn ris na daoine a leanas (agus ri daoine eile cuideachd): a h-uile neach-obrach, cunnaidearan, agus daoine eile a nì obair às leth BhnG. Tha e cuideachd a' buntainn ri modhan sam bith a chleachdar gus data pearsanta a làimhseachadh.

Am measg nan eisimpleirean a dh' fhaodadh a bhith ann tha:

- Clàran pàipeir a tha air an stòradh ann an siostaman-faidhlidh freagarrach (mar a tha air a mhìneachadh fon Achd);
- Data air a chumail ann an cruth eileagtronaigeach ann an stòr-dàta, faidhlichean, no ann an siostam eileagtronaigeach eile a' gabhail a-steach siostaman "cloud". Tha seo a' gabhail a-steach chlàraidhean fuaime is lèirsinne agus siostam sam bith a thèid a chleachdadh airson an stòradh;
- Dàta eileagtronaigeach air a chumail ann am meadhan sam bith eile, mar eisimpleir, air dràibhean-pinn, diosgaichean sùbailte agus CD ROM, agus
- Data no clàran air an cumail ann an tasglann eileagtronaigeach no tasglann pàipeir de sheòrsa sam bith.

Fios mu reachdas agus prionnsapalan airson Dìon Dàta

Tha diofar sheòrsaichean reachdais ann a bhinneas ris mar a thèid dèiligeadh ri fiosrachadh pearsanta. 'S iad sin an Riaghailt Choitcheann airson Dìon Dàta

Scope

This policy applies to anyone who is processing personal information on behalf of Bòrd na Gàidhlig, which may include but is not limited to, all employees, contractors, and any other third party performing a function on behalf of Bòrd na Gàidhlig. It also applies to any methods of processing personal data.

Examples may include:

- manually stored paper records that are in a relevant filing system (as defined by Data Protection Law);
- electronically held data in databases, files, or any other electronic system including cloud-based systems. This includes audio and visual recordings and any associated system used for storage;
- electronic data held on any other media, for example, pen drives, floppy discs and CD ROMs; and
- data or records held in any type of electronic or hard copy archive.

Introduction to Data Protection Legislation

There are a number of different legislation that apply when processing personal information. These are the UK General Data Protection Regulation (UK GDPR), the Data

(UK GDPR), An Achd Dion Dàta 2018 (DPA 2018), Na Riaghailtean airson Priobhaideachd is Conaltradh Eileagtronaigeach 2003 (PECR) agus reachdas buntainneach eile. Sa phoileasaidh seo, canar Laghan Dion Dàta riutha sin, agus tha iad a' riaghladh mar a thèid dèiligeadh ri "data pearsanta".

Protection Act 2018 (DPA 2018), the Privacy and Electronic Communications Regulations 2003 (PECR) and other associated legislation. These are collectively referred to in this policy as Data Protection Law, which govern the processing of personal data.

Tha data pearsanta rud sam bith a bhuineas ri neach a tha beò agus a ghabhas aithneachadh, gu dìreach no gu neo-dhìreach, bhon fhiosrachadh. Sa phoileasaidh seo, bu choir gabhail ris gu bheil na h-abairtean dàta pearsanta is fiosrachadh pearsanta a' ciallachadh dàta pearsanta mar a tha e air a mhìneachadh fo Laghan Dion Dàta.

Personal data is any information that relates to an identifiable living individual who can be identified directly or indirectly from the information. Within this policy, both the terms personal data and personal information should be taken to mean personal data as defined by Data Protection Law.

Feumar gach pìos dàta pearsanta a làimhseachadh a rèir nan 6 prionnsabalan san UK GDPR mura h-eil am fiosrachadh a' tighinn fo shaoradh. 'S iad na prionnsabalan:

All personal data must be processed in accordance with the 7 principles of the UK GDPR, unless the information is subject to an exemption. The principles are:

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| <ol style="list-style-type: none"> 1. Feumar dèiligeadh ri dàta pearsanta ann an dòigh chothromach, laghail agus shoilleir; 2. Thèid dàta pearsanta a chruinneachadh airson adhbharan ainmichte, follaiseach agus dligheach (adhbharan cuibhrichte); 3. Bidh an dàta pearsanta freagarrach, buntainneach agus bidh dìreach gu leòr ann airson an adhbhair/nan adhbharan a thathar ga làimhseachadh (an uiread as lùgha dàta a tha dhìth); 4. Bidh an dàta pearsanta neo-mhearachdach, agus nuair a dh'fheumar, air ùrachadh (pongalachd); 5. Cha tèid dàta pearsanta a chumail ann an riochd far an urrainnear an neach ris am buin an dàta aithneachadh nas fhaide na an ùine a tha dhìth airson an adhbhar/nan adhbharan sin (modhan-stòraidh cuibhrichte); | <ol style="list-style-type: none"> 1. Personal data must be processed fairly, lawfully and in a transparent manner; 2. Personal data shall be collected for specified, explicit and legitimate purposes (purpose limitation); 3. Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation); 4. Personal data shall be accurate and, where necessary, kept up to date (accuracy); 5. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for that purpose(s) (storage limitation); |
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6. Thèid dèiligeadh ri dàta pearsanta ann an dòigh san dèanar cinnteach gun tèid an dàta sin a chumail tèarainte san dòigh a bu choir, a' gabhail a-steach dìon bho bhith air a chleachdadh ann an dòigh neo-cheadaichte no mì-laghail agus bho chall tuiteamach, sgrios no milleadh, agus nithear sin le bhith a' cur mhodhan-obrach teicnigeach no meadhanan a th' aig a' bhuidhinn a tha freagarrach an sàs (tèarainteachd is dìomhaireachd).
 7. Cunntachalachd, the seo a' ciallachadh gum bi an rianadair dàta a' gabhail uallach airson, agus gun urrainn dhaibh dearbhadh gu bheil iad a' cumail ris, na prionnsabalan gu h-àrd. Gheibhar barrachd fiosrachadh mu dheidhinn ciamar a bhios Bòrd na Gàidhlig a' dèiligeadh ri na prionnsapailan seo ann an earrain 5.0.
6. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality);
 7. Accountability, which means the controller shall be responsible for, and be able to demonstrate compliance with, the principles above. Further information about how Bòrd na Gàidhlig complies with the principles can be found at Section 5.0.

3 A' Làimhseachadh Dàta

Tha na faclan làimhseachadh no dèiligeadh, air am mìneachadh fon UK GDPR, a' gabhail a-steach a' faighinn, a' clàradh no a' cumail dàta pearsanta no ag obrachadh no a' dèanamh gnìomhan leis an dàta. Am measg nan gnìomhan sònraichte a dh' fhaodar a dhèanamh le dàta tha: ga chruinneachadh, ga chur an òrdugh, ga stòradh, ga ath-dheasachadh no ga atharrachadh, ga fhaighinn air ais, a' faighinn beachd no fios bhuaithe, ga chleachdadh, ga fhoillseachadh le bhith ga sgaoileadh, ga sgaoileadh no a' toirt cothrom do dhaoine air ann an dòigh eile, ga chur còmhla ri fiosrachadh eile, a' cur casg air, ga sguabadh às no a' cur às dha. Chan eil e gu diofar ged a bhiodh na gnìomhan seo air an dèanamh le duine no le inneal.

Dàta Pearsanta

Nuair a thathar a' làimhseachadh data pearsanta, feumar cumail ri riatanasan àraid gus cumail ris an lagh, mura h-eil

Processing Data

The term processing is defined by the UK GDPR and used to cover obtaining, recording or holding personal data or carrying out any operation or set of operations on the data. More specific activities may be collection, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction. It is usually irrelevant whether these actions are manual or automated.

Personal Data

When processing personal data, there are certain conditions that must be satisfied for the processing to be lawful unless the

saoradh ann airson mar a thèid an dàta a làimhseachadh. Gheibhear iomradh orra sin ann an Artaigil 6 den UK GDPR agus feumar co-dhiù aon riatanas a choileanadh:

- Tha an neach ris am buin an dàta air cead a thoirt seachad gus an dàta a làimhseachadh
- Feumar an dàta a làimhseachadh gus cùmhnant a choileanadh sa bheil an neach ris am buin an dàta an sàs (no gus ceumannan a ghabhail gus cùmhnant aontachadh);
- Feumar an dàta a làimhseachadh gus cumail ri dleastanas laghail sam bith a dh' fheumas an rianadair dàta a choileanadh, taobh a-muigh nan dleastanasan a thigeadh orra ri linn cùmhnant;
- Feumar an dàta a làimhseachadh gus dìon a dhèanamh air math cudromach an neach ris am buin an dàta;
- Feumar an dàta a làimhseachadh gus obair no gnìomh a dhèanamh a chum leas a' phobail no gus dleastanas oifigeil a th' air an rianadair a choileanadh;
- Feumar an dàta a làimhseachadh air adhbharan laghail a bhuineas ris an rianadair dàta no treas pàrtaidh.

processing is subject to an exemption. These can be found at Article 6 of the UK GDPR and at least one condition must be satisfied:

- the data subject has given their consent to process the data;
- processing is necessary for the performance of a contract to which the data subject is a party (or to take steps to enter into a contract);
- the processing is necessary for compliance with any legal obligation to which the data controller is subject, other than an obligation imposed by contract;
- the processing is necessary in order to protect the vital interests of the data subject;
- the 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;
- the processing is necessary for the purposes of legitimate interests pursued by the controller or third party.

Dàta Pearsanta do sheòrsa Sònraichte

Tha cuid a dhàta pearsanta a tha air a chomharrachadh fon UK GDPR mar dhàta pearsanta de sheòrsa sònraichte. Nuair a thathar gu bhith làimhseachadh dàta pearsanta diomhair, bu choir do neach sam bith a tha làimhseachadh dàta pearsanta dèanamh cinnteach gun tèid a làimhseachadh ann an dòigh a choileanas na cumhachan ann an Artaigil 9 no

Special Category Personal Data

There is certain personal data which is defined by the UK GDPR as special categories of personal data. Where this type of sensitive personal data is to be processed, anyone who is processing personal data should ensure that the processing satisfies the necessary conditions at Article 9 and Schedule 1 of the DPA 2018.

dèanamh cinnteach co-dhiù a tha no nach eil an dàta a' tighinn fo shaoradh ainmichte ann am Pàipear-taice 1 den DPA 2018.

Tha seo a' gabhail a-steach dàta pearsanta a bhuineas ri:

- freumhan cinneadail no cinneachail
- beachdan poiliteagach;
- beachdan a thaobh creideimh;
- ballrachd ann an aonadh ciùird;
- euslaint chorporra no inntinne;
- beatha ghnèitheasach.

This includes personal data relating to:

- racial or ethnic origin;
- political opinions;
- religious beliefs;
- trade union membership;
- physical or mental health condition;
- sexual life.

Tha an UK GDPR cuideachd a stèidheachadh chumhachan sònraichte (Artaigil 10) airson: fiosrachadh mu eucoir; agus cùisean lagha airson eucoir sam bith a rinneadh no eucoir sam bith a thathar a' cumail a-mach a rinneadh.

The UK GDPR also makes special provisions for (Article 10): information about offences; and proceedings for any offences committed or alleged to have been committed.

4 **Dàta Pearsanta air a Làimhseachadh le Bòrd na Gàidhlig**

Personal Data Processed by Bòrd na Gàidhlig

Bidh an rianadair dàta, sin Bòrd na Gàidhlig, a' cò-dhùnadh dè na dòighean sam bithear a' làimhseachadh dàta pearsanta agus dè na h-adhbharan air a bheil, no air am bithear, ga chur gu feum.

The controller, in this case Bòrd na Gàidhlig, determines the purposes for which and the manner in which any personal data are, or are to be, processed.

'S e a th' ann an neach-làimhseachaidh dàta, neach sam bith, ach a-mhàin neach-obrach air am fastadh aig an rianadair dàta, a bhios a' cur dàta gu feum às leth an rianadair dàta.

A processor is any person, other than an employee of a controller, who processes the data on behalf of the controller.

Chithear fiosrachadh gu h-ìosal air an dàta phearsanta a bhios air a chumail agus air a làimhseachadh le Bòrd na Gàidhlig, agus mìneachadh air na prìomh adhbharan airson a bhith ga chur gu feum.

The personal data held and processed by Bòrd na Gàidhlig, and primary purposes for which it is processed are detailed below.

Chithear mìneachadh air an ùine a bhios Bòrd na Gàidhlig, a' cumail dàta pearsanta sna clàran-ama glèidhidh agus sna clàran-ama airson cur às dha.

The period for which personal data is held by Bòrd na Gàidhlig is documented in the retention and destruction schedules.

Gheibhear am bun-stèidh laghail airson a bhith a' làimhseachadh fiosrachadh pearsanta san fhiosrachadh mu phrìobhaideachd (a gheibhear air làrach-lìn Bhòrd na Gàidhlig) ach a-mhàin am bun-stèidh airson a bhith a' làimhseachadh dàta pearsanta mu dheidhinn luchd-obrach a tha air a mhìneachadh sa chlàr-am ghleidhidh.

The lawful basis being used to process personal information is provided in the privacy notice information (which is available from the Bòrd na Gàidhlig website)..

Faidhlichean Luchd-obrach

Employee Files

Tha faidhlichean sgiobachd gan cumail airson luchd-obrach le fiosrachadh mu na cùisean a leanas:

HR files are held on staff and contain information relating to the following:

- Fiosrachadh pearsanta le fios air rudan mar an luchd-dàimh as fhaisge
 - Fiosrachadh cùmhnaint
 - Lethbhric de sgrìobhainnean a chaidh a chleachdadh gus dearbhadh gum faod luchd-obrach obair san RA
 - Fiosrachadh pàighidh leithid na h-àireamh airson àrachais nàiseanta
 - Fiosrachadh a bhuineas ri sgrùdaidhean a rinneadh mus deach an neach-obrach fhastadh
 - Fiosrachadh a bhuineas ri rannsachaidhean smachdachaidh
 - Clàran trèanaidh
 - Clàran meidigeach
 - Clàran sam bith eile air a bheil feum gu dligheach gus dèiligeadh ri cosnadh neach-obrach fhad 's a tha iad ag obair aig BnG.
- Personal details including next of kin
 - Contract information
 - Copies of documentation used for verifying eligibility to work in the UK
 - Pay information including national insurance number
 - Information relating to any pre-employment checks
 - Information relating to disciplinary investigations
 - Training records
 - Medical records
 - Any other records that are legitimately required to manage a member of staff's employment with Bòrd na Gàidhlig.

Bithear cuideachd a' cumail chlàran a bhuineas ri modhan-trusaidh a' gabhail a-steach cliath-dhuilleagan le sgòraichean agus notaichean bho agallamhan airson luchd-obrach agus tagraichean nach d' fhuair obair. Dìreach mar a tha fìor mu

Records are also held that relate to the recruitment process including scoring spreadsheets and interview notes for both staff and unsuccessful candidates. In the same way as any other information, this would usually be made available under a

fhiosrachadh eile, gu h-àbhaisteach bheirear am fiosrachadh seo seachad ma gheibhear iarrtas bho Neach airson am Fiosrachadh Fhèin (SAR) mura h-eile saoradh ann, faicibh Earrainn 9.0.

Subject Access Request (SAR) unless it is subject to an exemption, see Section 8.0.

Slàinte is Sàbhailteachd

Thèid fiosrachadh co-cheangailte ri tubaistean a chàradh mar a dh' fheumar fo laghan slàinte is sàbhailteachd. Thèid am fiosrachadh sin a chlàradh san leabhar thubaistean a rèir nan laghan iomchaidh, agus feumar sin a dhèanamh a rèir na thathar a' moladh fo na Laghan Dìon Dàta.

Health and Safety

Information relating to accidents is recorded as required by health and safety law. This information is recorded in the accident book in accordance with relevant legislation, which must also be compliant with Data Protection Law.

Fiosrachadh a Bhuineas ri Seirbheisean Bhòrd na Gàidhlig

Cumaidh Bòrd na Gàidhlig fiosrachadh pearsanta a bhuineas ri daoine no buidheann a chuireas iarrtas a-steach airson aon de na sgeamaichean maoineachaidh a tha Bòrd na Gàidhlig a' ruith an-dràsta. Cha chruinnichear ach am fiosrachadh pearsanta a tha dhìth airson an iarrtais, agus thèid a chumail a rèir nan clàran-ama iomchaidh airson gleidheadh is cur às do dh' fhiosrachadh.

Information Relating to Bòrd na Gàidhlig's Services

Bòrd na Gàidhlig will hold personal information relating to those that make an application to one of the current funding schemes being administered by Bòrd na Gàidhlig. Only personal information required to process the application is collected, and is retained in accordance with the relevant retention and destruction schedule.

Dàta Rannsachaidh

Tha prògram rannsachaidh farsaing aig Bòrd na Gàidhlig far am bithear a' làimhseachadh fiosrachadh pearsanta. Bidh cuid den fhiosrachadh sin a' tighinn fo shaoradh mar a tha e air a mhìneachadh san DPA 2018. Cha tèid toraidhean rannsachaidh fhoillseachadh ach ann an cruth far nach eil daoine air an ainmeachadh, ach a-mhàin nuair a tha cead dearbhte aig Bòrd na Gàidhlig bho na daoine ris am buin am fiosrachadh a tha gu bhith air fhoillseachadh. Dh' fhaodadh gum faigh buidheann eile cothrom air dàta rannsachaidh aig a bheil adhbharan dligheach an dàta pearsanta a chleachdadh, agus sin a rèir aonta co-roinn fiosrachaidh (faicibh Earrainn 6.0).

Research Data

Bòrd na Gàidhlig has a comprehensive research programme that involves processing personal information. Some of this information will be subject to an exemption as detailed in the DPA 2018. Any results of research will only be published in an anonymised form, unless Bòrd na Gàidhlig has the explicit consent of those whose information is being published. Research data may be made available to other organisations that have a legitimate purpose and use of the personal information, subject to an information sharing agreement (see Section 6.0). It should be noted that Bòrd na Gàidhlig may not always be the controller of the original research data collected.

Bu choir cuimhneachadh, nach bi Bòrd na Gàidhlig daonnan na rianadair airson an dàta rannsachaidh a chaidh a chruinneachadh sa chiad dol a-mach

Fiosrachadh Conaltraidh

Bidh Bòrd na Gàidhlig, airson tòrr den obair sanasachd is mhargaidheachd a nì e, a' cleachdadh liostaichean-conaltraidh airson adhbharan margaidheachd. Mar is trice, feumar cead dearbhte fhaighinn bho dhaoine mus tèid an seòlaidhean puist-d a chleachdadh airson nan adhbharan seo, mura h-eile an neach na "neach clàraichte corporra". Gheibhear tuilleadh fiosrachaidh ann an Earrainn 12.0 agus san Stiùireadh airson Rian a Chumail air Liostaichean-conaltraidh.

A' Toirt Theisteanas seachad às leth Bhòrd na Gàidhlig

Ma gheibh neach-obrach sam bith iarrrtas ag iarraidh teisteanas airson neach a tha, no a bha, nan neach-obrach aig Bòrd na Gàidhlig, bu choir dhaibh an t-iarrrtas a chur chun an Ceann an Iomhais is Cùisean Corporra. Ma roghnaicheas an neach-obrach teisteanas pearsanta a thoirt seachad, chan fhaod iad air dhòigh sam bith a ràdh gun deach an teisteanas a thoirt seachad le Bòrd na Gàidhlig, ach feumar a dhèanamh soilleir gur iadsan gu pearsanta a tha toirt teisteanas seachad.

5 Cunntalachd

Tha Bòrd na Gàidhlig air Oifigear Dìon Dàta (DPO) fhadstadh a bheir seachad comhairle agus a chumas sùil air a' bhuidheann agus an luchd-obrach a thaobh mar a tha iad a' cumail ri Lagh Dìon Dàta agus ris a' phoileasaidh seo. Bheir an DPO fios don Chomataidh Sgrùdaidh is Dearbhachd, agus cuideachd a Bhòrd mar as àbhaist gach bliadhna agus àrdaichidh e/i cunnartan agus ceistean a thaobh prìobhaideachd leis an Àrd-oifigear Cunnart Fiosrachaidh (SIRO) mar a bhios iomchaidh.

Contact Information

Much of the promotional work undertaken by Bòrd na Gàidhlig uses contacts lists for marketing purposes. Explicit consent must usually be obtained in order to use e-mail addresses for this purpose, unless the person is a "corporate subscriber". Further information is available at Section 12.0 and in the Guidance on Managing Contacts Lists.

Providing References on Behalf of Bòrd na Gàidhlig

Any member of staff receiving a request for a reference for a person who has been, or is currently, employed by Bòrd na Gàidhlig, should forward the request to the Head of Finance and Corporate Affairs. Where an employee chooses to provide a reference in a personal capacity, on no account may they imply the reference has been provided by Bòrd na Gàidhlig, and it must be made clear that the reference has been provided in a personal capacity.

Accountability

Bòrd na Gàidhlig has appointed a Data Protection Officer (DPO) who will advise and monitor the organisation and its staff on its compliance with Data Protection Law and this policy. The DPO will report to Audit and Assurance Committee, and usually the Board on an annual basis and will escalate privacy risks and issues with the Senior Information Risk Officer (SIRO) as necessary.

Bidh raon de dhòighean cunntachalachd agus sgrùdaidh aig Bòrd na Gàidhlig mar a leanas:

- Cumaidh Bòrd na Gàidhlig Clàr de Ghnìomhan Pròiseasaidh (ROPA) a rèir Alt 30 de GDPR na RA, a' clàradh gach adhbhar aig Bòrd na Gàidhlig airson a bhith a' cleachdadh dàta pearsanta, a' bhunait laghail fo Artaigil 6 de UK GDPR agus – airson gach cleachdadh de dàta pearsanta de sheòrsa sònraichte – a' bhunait laghail fo Artaigil 9 de UK GDPR agus Clàr 1 de dh'Achd Dìon Dàta 2018;
- Cumaidh an SIRO Clàr Goireasan Fiosrachaidh (IAR) a' comharrachadh goireasan fiosrachaidh uile Bhòrd na Gàidhlig agus an t-Sealbhadair Goireasan Fiosrachaidh cunntachail (IAO). Tha e an urra ri IAO an SIRO a chuideachadh gus dèanamh cinnteach gun dèanar ath-sgrùdadh air gach pàirt den IAR co-dhiù gach bliadhna;
- Sanasan prìobhaideachd;
- Measaidhean Buaidh Dìon Dàta (DPIAn – faic gu h-ìosal);
- Clàran mu bhith a' freagairt Brisidhean Dàta Pearsanta (faic gu h-ìosal);
- Clàran mu bhith a' rianachd Chòirichean Cuspair Dàta (faic gu h-ìosal);
- Clàran de thrèanadh luchd-obrach agus togail mothachaidh (faic gu h-ìosal);
- Cumhachan cùmhnaint buntainneach;
- A' cumail suas agus ag ùrachadh a' phoileasaidh seo agus na poileasaidhean agus modhan-obrach

Bòrd na Gàidhlig will maintain a range of accountability and monitoring mechanisms as follows:

- Bòrd na Gàidhlig will maintain a Record of Processing Activity (ROPA) compliant with Article 30 of UK GDPR documenting all purposes for which Bòrd na Gàidhlig uses personal data, the lawful basis under Article 6 of UK GDPR and – for all uses of special category personal data – the lawful basis under Article 9 of UK GDPR and Schedule 1 of the Data Protection Act 2018;
- The SIRO will maintain an Information Asset Register (IAR) identifying all Bòrd na Gàidhlig information assets and the relevant accountable Information Asset Owner (IAO). IAOs are responsible for assisting the SIRO with ensuring all parts of the IAR are revised on at least an annual basis;
- Privacy notices;
- Data Protection Impact Assessments (DPIAs – see below);
- Records of responding to Personal Data Breaches (see below);
- Records of administering Data Subject Rights (see below);
- Records of staff training and awareness raising (see below);
- Relevant contract clauses;
- Maintaining and updating this policy and associated policies and procedures for compliance with Data Protection law.

co-cheangailte riutha airson
gèilleadh ri lagh Dìon Dàta

Tha prionnsapal na Cunntachalachd cuideachd a' toirt air Bòrd na Gàidhlig dearbhadh mar a tha e gu bhith a' cumail ri lagh dìon dàta agus tha cuid de na prìomh raointean air am mìneachadh gu h-ìosal

Laghalachd, Cothromachd agus Follaiseachd

Bidh an dàta pearsanta uile a thèid a phròiseasadh le Bòrd na Gàidhlig a' tighinn taobh a-staigh adhbharan agus bunaitean laghail a tha clàraichte san ROPA, agus bidh adhbharan ùra fo smachd pròiseas DPIA a tha air a mhìneachadh gu h-ìosal. Nì seo cinnteach gu bheil bunait laghail air a chomharrachadh agus air a chlàradh, agus gu bheil cleachdadh dàta pearsanta cothromach do chuspairean data

Cumaidh Bòrd na Gàidhlig fiosan priobhaideachd ceart agus ùraichte airson luchd-obrach, luchd-cleachdaidh sheirbheisean, agus treas phàrtaidhean eile aig a bheil dàta pearsanta a tha air a phròiseasadh le Bòrd na Gàidhlig

Cuingalachadh Adhbharan

Chan fhaod luchd-obrach Bhòrd na Gàidhlig dàta pearsanta air a bheil cothrom aca tron obair aca a chleachdadh ach airson adhbharan ùghdarraichte iomchaidh, agus chan fhaod iad feuchainn ri dàta pearsanta inntreigeadh no a chleachdadh nach eil buntainneach dhan dreuchd aca.

Tha na h-adhbharan dham faod Bòrd na Gàidhlig dàta pearsanta agus dàta pearsanta de sheòrsa sònraichte a bhith air a phròiseasadh air an clàradh san ROPA.

The principle of Accountability also requires Bòrd na Gàidhlig to demonstrate how it is going to comply with data protection law and some of the key areas are described below.

Lawfulness, Fairness and Transparency

All personal data that is processed by Bòrd na Gàidhlig will fall within purposes and lawful bases documented in the ROPA, and new purposes will be subject to the DPIA process described below. This will ensure that a lawful basis is identified and recorded, and that any use of personal data is fair to data subjects.

Bòrd na Gàidhlig will maintain accurate and up to date privacy notices for employees, services users, and other third parties whose personal data is processed by Bòrd na Gàidhlig.

Purpose Limitation

All Bòrd na Gàidhlig staff may only use personal data which they have access to through their role for relevant authorised purposes, and must not attempt to access or use personal data that is not relevant to their role.

The purposes for which personal data and special categories of personal data may be processed by Bòrd na Gàidhlig are documented in the ROPA.

A' Lùghdachadh Dàta

Feumaidh gach neach-obrach aig Bòrd na Gàidhlig a bhios a' cruinneachadh no a' cruthachadh dàta pearsanta dèanamh cinnteach gu bheil an dàta pearsanta a chaidh a chruinneachadh riatanach agus nach eil barrachd dàta ann na tha a dhith airson an adhbhair dhan deach a chruinneachadh. Tha IAOn cuideachd cudromach ann a bhith a' dèanamh cinnteach gu bheil cleachdadh agus glèidheadh dàta pearsanta a rèir feumalachd.

Pongalachd

Thèid ceumannan reusanta a ghabhail (mar as trice air an comharrachadh tro DPIA agus an uair sin tro sgrùdadh leantainneach) gus dèanamh cinnteach gu bheil dàta pearsanta ceart agus bidh seo a' gabhail a-steach a bhith a' dealbhadh shiostaman gus an coltas a lùghdachadh gun tèid dàta mearachdach a chur a-steach. Ma chomharraicheas neach-obrach sam bith dàta pearsanta mearachdach, gabhaidh iad ceumannan iomchaidh gus an dàta a cheartachadh no ùrachadh.

Treibhdhreas agus Dìomhaireachd

Feumaidh Bòrd na Gàidhlig modhan teicnigeach agus modhan-obrach iomchaidh a chur an sàs sa bhuidhinn gus dìon a dhèanamh air dàta feuch nach tèid feum a dhèanamh dheth ann an dòigh mhì-laghail. Bidh gach neach-obrach a' soidhnigeadh cumha dìomhaireachd a tha mar phàirt den chùmhnant-obrach aca. Bu choir coimhead air dàta pearsanta sam bith mar fhiosrachadh dìomhair agus mar sin tha e air a riaghladh leis a' chumha seo den chùmhnant-obrach.

Tha e an urra ri neach-obrach a bhiod a' solar sheibheisean bho neach no bhuidheann eile, far am bithear a'

Data Minimisation

All Bòrd na Gàidhlig staff collecting or creating personal data must ensure that the personal data collected is necessary and not excessive for its purpose. IAOs also have a role in ensuring that the use and retention of personal data is justified.

Accuracy

Reasonable steps will be taken (usually identified through a DPIA and then ongoing auditing) to ensure the accuracy of personal data which will include designing systems to reduce the likelihood of inaccurate data being entered. All staff, on identifying inaccurate personal data, will take appropriate steps to correct or update the data.

Integrity and Confidentiality

Bòrd na Gàidhlig is required to take appropriate organisational and technical measures to protect personal data from unlawful processing. All employees sign a confidentiality clause which forms part of their contract of employment. Any personal data should be considered information of a confidential nature and is therefore governed by this clause in the employment contract.

Any employee involved in procuring services from a third party that will involve the processing of personal data originating from

làimhseachadh dàta pearsanta a thig bho BnG, dèanamh cinnteach gum bi cumha den t-seòrsa gu h-àrd sa chùmhnannt airson sheirbheisean. Tha e cuideachd an urra riutha dearbhadh a bheil gus nach eil aonta a dhìth airson a bhith làimhseachadh dàta. Nuair nach cùmhnant foirmeil ann arosn sheirbheisean, feumaidh aonta sgrìobhte a bhith ann fhathast a tha mineachadh nan uallaichean is nan dleastanasan a th' air solaraidhe na seirbheis a thaobh dàta pearsanta. Nuair a than a seirbheisean a thathar a' ceannach a' dol a thoirt atharrachadh air siostaman no modhan-obrach co-cheangailte ri dàta pearsanta, bidh measadh air a' bhuidhe air prìobhaideachd a dhìth cuideachd 's docha, mar a tha air a mhìneachadh ann an Earrainn 12.

Bòrd na Gàidhlig is responsible for ensuring a similar clause is included in the contract for services. They are also responsible for determining whether a data processing agreement is required. Where there is no formal contract in place for services, there must still be a written agreement in place that defines the roles and responsibilities of the service provider with regard to personal data. Where the services being procured involve system or procedural changes relating to personal data a data protection impact assessment may also be required, detailed at Section 12.

Feumaidh neach sam bith a bhios a' làimhseachadh dàta pearsanta a bhith air earalas gus dèanamg cinnteach nach brist iad cumha sam bith den UK GDPR. Feumaidh daoine a tha a' làimhseachadh dàta pearsanta, aig a' char as lugha, cumail ris na riaghailtean a leanas:

Anyone who is processing personal data must take every possible precaution to prevent a breach of the UK GDPR. In practice, as a minimum, those processing personal data must:

- Bu choir dhaibh dàta pearsanta a làimhseachadh dìreach airson nan adhbharan a tha e ceadaichte dhaibh a làimhseachadh agus a rèir modhan-obrach na buidhne. Ma làimhsicheas neach dàta airson adhbhar sam bith eile, dh' fhaodadh sin a bhith na dhroch bhristeadh de na riaghailtean obrach aca agus na chùis smachdachaidh:
- Bu choir dhaibh cumail ri poileasaidh far an sgioblaich iad stuthan dìomhair bhon deasg aca nuair a tha iad deiseil leotha:
- Bu choir dhaibh dèanamh cinnteach nach fhaigh daoine gun chead cothrom air an fhiosrachadh phearsanta, mar eisimpleir, daoine a bhios a' tadhal air an Oifis no luchd-cleachdaidh aig an ionad-fàilte;
- Only process personal data for the purposes for which they are authorised to do so and using corporate procedures. To process data for any other purpose may be a serious disciplinary offence;
- Operate a clear desk policy;
- Ensure personal information cannot be accessed by unauthorised people, for example, visitors to the office or customers at an information desk;

- Bu choir dhaibh cur às do phàipearan is stuthan fiosaigeach le stialladair no le bhith gan cur don sgudail dhìomhair. Bu choir sgudal dìomhair a chumail fo ghlas gus an tèid a thoirt air falbh;
- Bu choir dhaibh dìreach uidheamachd a tha fo shealbh BhnG a chleachdadh gus dàta a làimhseachadh, a' gabhail a-steach uidheamachd so-ghiùlan. Feumaidh uidheamachd a chleachdar a bhith de sheòrsa ùghdarraichte agus feumaidh e a bhith air inchrioptadh gu tur **daonnan**. Cha bu chòir dhaibh dàta pearsanta a stòradh no a làimhseachadh le uidheaman neo-chrioptaichte, agus cha bu choir dhaibh **uair sam bith** a làimhseachadh air na h-uidheaman aca fhèin, no le bhith cleachdadh post-d pearsanta no cunntas pearsanta sam bith airson a bhith a' roinn fiosrachaidh;
- Bu choir dhaibh faidhlichean pàipeir no stuthan clò-bhuailte bho choimpiutair, sam faodadh fiosrachadh pearsanta a bhith, a chumail ann an àite tèarainte mar chaibineat le glas no, ma thathar gan toirt leibh, ann am бага glaiste;
- Cha bu choir dhaibh lethbhric de sgrìobhainnean dìomhair air pàipear no an am meadhan fiosaigeach eile a ghiùlan mas urrainn dhaibh sin a sheachnadh. Cha bu chòir dàta pearsanta a thoirt do luchd-obrach, ann an cruth sam bith, airson a ghiùlan bho àite gu àite eile mura gabh e a sheachnadh agus feumaidh am fiosrachadh an uair sin a bhith ann am pacaid a tha air a dùnadh gu ceart agus tèarainte;
- Feumaidh daoine uidheaman coimpiutaireachd, a' gabhail a-steach laptops agus stoban-cuimhne, ceadaichte a chleachdadh a tha air an inchrioptadh;
- Dispose of hard copy material using a shredder or confidential waste. Confidential waste should be locked away while waiting for collection;
- Only process data on equipment that is owned by Bòrd na Gàidhlig including portable equipment. The equipment must be of an approved type and be fully encrypted **without exception**. Personal data shall not be stored or processed on unencrypted devices, and should **never** be processed on personally owned equipment, or using a personal e-mail or any other type of personal information sharing account;
- Paper files or material printed from a computer which may contain personal information must be kept secure such as in a locked filing cabinet, or if being transported, in a locked bag;
- Carrying of hard copy confidential documents should be avoided where possible. Staff should not be given personal data, in any format, to transport from one location to another unless it is unavoidable and the information is in a package that has been adequately sealed and is tamper-proof;
- Portable computing devices including laptops and flash drives must be approved and encrypted;

- Chan fhaodar **uair sam bith** dàta pearsanta, agus gu h-àraidh dàta pearsanta dìomhair, a chur ann am facs gu cuideigin. Ma dh' fheumas daoine lethbhric phàipeir, no lethbhric ann am meadhan fiosaigeach eile, a chur a dh' àiteigin, bu chòir dhaibh companaidh libhrigidh a chleachdadh gus an dàta a chumail sàbhailte fhad 's a thathar ga ghluasad. Faodar puist-d le dàta pearsanta a chur gu daoine taobh a-staigh na buidhne, ge-tà, nuair a thèid dàta pearsanta a chur gu buidheann air an taobh a-muigh, bu chòir seirbheisean puist-d inchrìoptaichte a chleachdadh daonnan. Feumar modhan-tèarainteachd iomchaidh a chur an sàs gus dèanamh cinnteach gun ruig am post-d an neach gun deach a chur.
- Personal data, and in particular sensitive personal data, must **never** be faxed. If it is necessary to send hard copies between locations a courier should be used to safeguard the data while in transit. E-mails containing personal data may be sent to internal recipients, however, where personal data is to be sent to an external organisation, encrypted e-mail services should always be used. Appropriate safeguards must be implemented to ensure the e-mail reaches its intended recipient.

5.6 Cuingeachadh Stòraidh

Thèid gach pìos fiosrachaidh, a' gabhail a-steach dàta pearsanta, a ghleidheadh a rèir nan clàran-ama aig Bòrd na Gàidhlig airson a bhith gleidheadh fiosrachadh. Tha na clàran-ama seo a' gabhail ealla ris na cumhachan laghail sna Laghan Dìon Dàta nuair a tha sin freagarrach, gu h-àraidh a thaobh a' phrionnsabail co-cheangailte ri modhan-stòraidh cuibhrichte, a tha ag ràdh nach cumar dàta pearsanta ann an riochd far an urrainnear an neach ris am buin an dàta aithneachadh nas fhaide na tha an dàta a dhìth san riochd sin.

Bu chòir dèiligeadh ris a h-uile seòrsa dàta pearsanta ann an dòigh dhìomhair agus bu chòir cur às dha gu tèarainte. Cha bu chòir lethbhreac a dhèanamh de dhàta pearsanta ach nuair a tha feum dha-rìribh air sin air adhbharan dligheach, mar eisimpleir, a' dèanamh lethbhreac cùl-taice de dhàta air siostam.

Ag Atharrachadh Shìostaman

Uair sam bith a thèid atharraichean mòra a dhèanamh air modhan-obrach no

5.6 Storage Limitation

All information, including personal data, will be retained in accordance with Bòrd na Gàidhlig's retention schedules. These schedules have taken into consideration the legal requirements of Data Protection Law where appropriate, in particular the principle of storage limitation, which states that personal data shall not be kept in a form that permits identification of data subjects for any longer than is necessary.

All personal data should be treated as confidential and should be destroyed securely. Personal data should never be duplicated unless absolutely essential for legitimate reasons, for example backing up system data.

System Development

Whenever there are significant changes to procedures or systems that contain personal

siostaman sa bheil dàta pearsanta, feumar Measadh air a' Bhuidh air Dìon Dàta (DPIA) a dhèanamh mus tèid na h-atharraichean a chur an sàs feuch a bheil cunnart sam bith ann do mar a thèid dàta pearsanta a làimhseachadh. Tha e deatamach gun tèid na toraidhean sin a thoirt fa-near nuair a tha leasachadh ga dhèanamh air an siostam.

Gheibhear stiùireadh air measaidhean air a' bhuidh air prìobhaideachd sa Chòd-obrach iomchaidh, faicibh Earrainn 12.

Trèanadh

Feumaidh gach neach-obrach a bhios a' làimhseachadh dàta pearsanta trèanadh freagarrach a thaobh dìon dàta a dhèanamh.

Aig a' char as lugha, feumaidh luchd-obrach a bhios a' làimhseachadh dàta pearsanta dèanamh cinnteach gun do leugh iad am Poileasaidh airson Dìon Dàta agus gu bheil iad air an trèanadh BNG a dhèanamh.

Bidh feum aig daoine a bhios a' làimhseachadh dàta dìomhair air barrachd trèanaidh a bhios mar phàirt den trèanadh a bheir a' bhuidheann seachad nuair a ghabhas sin dèanamh.

Bho àm gu àm, thèid seiseanan trèanaidh a dh' aona-ghnothach a thoirt do dhaoine a tha stiùireadh luchd-obrach. Bu chòir geuman trèanaidh sam bith eile a thoirt gu aire Ceann an Ionmhais is Cùisean Corporra nuair a tha e follaiseach gu bheil iad ann.

6 A' Co-Roinn Dàta

Nuair a thathar a co-roinn dàta pearsanta sam bith, feumar cumail ri cumhachan nan Laghan Dìon Dàta. Chan fhaodar dàta pearsanta a cho-roinn ach nuair a tha feum dligheach ann an dàta a làimhseachadh san dòigh sin airson nan adhbharan a tha ainmichte. Cuideachd,

data, a DPIA must be conducted prior to implementing the planned changes to determine any potential risks to the processing of personal data. It is essential that any findings are taken into consideration in system development.

Guidance on conducting data protection impact assessments can be found in the relevant guidance, see Section 12.

Training

All staff that process personal data are required to complete appropriate data protection training.

As a minimum, staff processing personal data must ensure that they have read the Data Protection Policy, completed any relevant courses available in the learning management system, and completed Bòrd na Gàidhlig's induction.

Those processing sensitive data will require additional training which will be incorporated into existing operational training wherever possible.

Periodically, customised training sessions will be provided for those managing staff. Any other training requirements should be raised with the Head of Finance and Corporate Affairs as and when they are identified.

Sharing Data

Any sharing of personal data must comply with the requirements of Data Protection Law. Personal data must only be shared where there is a legitimate requirement to process the data in that manner for the stated purposes. Sharing must also comply with the provisions of the Information

nuair a thathar a’ co-roinn dàta pearsanta, feumar cumail ri cumhachan Còd-obrach Coimiseanair an Fhiosrachaidh airson Dàta a Cho-roinn.

Commissioner’s (ICO) Data Sharing Code of Practice.

A’ Co-Roinn Dàta sa Chumantas

Gu h-àbhaisteach, cha bu chòir dàta a cho-roinn ach nuair a tha aonta sgrìobhte ann eadar gach neach no buidheann a thaobh na uallaichean is nan dleasan aca fo na Laghan Dìon Dàta. Bu chòir aonta fhaighinn bhon mhanaidsear fhreagarrach airson a bhith co-roinn dàta sa chumantas, aon uair ‘s gu bheil na modhan teicnigeach is modhan-obrach iomchaidh air an cur air dòigh sa bhuidhinn gus an dàta pearsanta a dhìon. A thaobh aon iartras sònraichte fa leth airson dàta a cho-roinn le cuideigin eile far nach eil aonta co-roinn ann mu thràth, faicibh Earrainn 8, Iarntasan airson Fiosrachaidh.

Routine Data Sharing

Data sharing should generally only take place where there is a written agreement in place between all parties with regards to roles and responsibilities Data Protection Law. Routine data sharing should be approved by the appropriate manager once the necessary organisational and technical measures are in place to protect the personal data. For a specific, one-off request to share data with a third party where there is no existing data sharing agreement in place see Section 8, Requests for Information.

A’ Co-Roinn Fiosrachadh le Luchd-sgrùdadh is Riaghladairean

Mar is trice, nuair a thathar a’ co-roinn fiosrachadh le riaghladairean ionmhasail airson adhbharan sgrùdadh, bidh sin a’ tighinn fo shaoraidhean sna Laghan Dìon Dàta no reachdas fa leth eile a tha air an riaghladair a stèidheachadh. Mar sin, gu h-àbhaisteach cha bhi feum air aontaidhean co-roinn dàta gus fiosrachadh a thoirt do riaghladairean airson adhbharan sgrùdadh.

Sharing Information with Auditors and Regulators

Information sharing with financial regulators for audit purposes will generally be covered by either by exemptions in Data Protection Law, or other specific legislation that establishes the regulator. Consequently, data sharing agreements are not normally required to pass information to regulators for audit purposes.

7 Iarntasan airson Fiosrachaidh

Nuair a gheibhear iartras airson fiosrachaidh, a’ gabhail a-steach iarntasan airson dàta pearsanta, gu h-àbhaisteach thèid dèiligeadh riutha a rèir Achd Saorsa an Fhiosrachaidh (Alba) 2002 (FOISA). Gus dàta pearsanta a thoirt seachad a bhuineas ri cuideigin eile mar fhreagairt do dh’ iartras airson fiosrachaidh (dàta pearsanta mu chuideigin eile seach an neach a dh’ iarr am fiosrachadh), feumar an dàta pearsanta a làimhseachadh a rèir nan Laghan Dìon Dàta.

Requests for Information

Any requests for information, including requests for personal data, are normally governed by the Freedom of Information (Scotland) Act 2002 (FOISA). In order to provide personal data belonging to a third party in response to a request for information (ie personal data about someone other than the person who has asked for the information), the personal data must be processed in accordance with Data Protection Law.

Nam biodh e an aghaidh aon no barrachd de na prionnsabalan san UK GDPR fiosrachadh a thoirt seachad mar fhreagairt do dh' iarrtas fo FOISA, bidh saoradh ann fon Riaghailt a thaobh a bhith foillseachadh an fhiosrachaidh sin. Dh' fhaodadh gum bi suidheachaidhean eile ann far am bi saoradh ann. Gheibhear fiosrachadh air saoraidhean ann an earrainn 38, Fiosrachadh Pearsanta, de FOISA. Tha saoradh fo FOISA ann cuideachd nuair a tha daoine ag iarraidh fiosrachadh pearsanta mun dheidhinn fhèin. 'S e iarrtas airson cothrom air an fhiosrachadh agad fhèin a tha sin, no iarrtas bho Neach airson am Fiosrachadh Fhèin (SAR), agus tha mìneachadh air mar a tha dèiligeadh ri sin san ath earrainn.

Nuair a dh' iarras buidheann fiosrachadh air adhbhar sònraichte, mar eisimpleir, iarrtas bhon phoileas gus stad a chur air eucoir a thoirt am follais, feumaidh na dòighean san tèid am fiosrachadh a làimhseachadh fhathast cumail ris na pàirtean iomchaidh de na Laghan Dion Dàta. Ma dh' iarras am poileas, no buidheann-ceartais sam bith eile, cothrom air dàta pearsanta, feumar sealltainn gu bheil an saoradh/na saoraidhean iomchaidh a' buntainn ris a' chùis ma tha iad buntainneach. Gach turas a gheibhear iarrtas airson dàta pearsanta (fiu 's nuair nach eil lethbhreac a dhìth air an neach a tha ga iarraidh, mar eisimpleir, le iarrtas coimhead air faidhle pearsanta), feumar fianais sgrìobhte a bhith ann air mar a chumadh ris na Laghan Dion Dàta agus feumar an fhianais sin a ghleidheadh còmhla ris an dàta phearsanta a chaidh fhoillseachadh.

Ma dh' iarras daoine eile cothrom air dàta pearsanta, feumar an dàta a ch-roinn ann an dòigh a tha cumail ris na Laghan Dion Dàta agus gus an dàta a ch-roinn bidh e buailteach gum feumte saoradh a bhith ann bhon Achd. Bu chòir

Where providing information in response to a FOISA request would breach one or more of the principles of the UK GDPR, the information is exempt from disclosure. There may be other circumstances where exemptions apply. Exemptions are detailed in section 38, Personal Information, of FOISA. People requesting personal information about themselves is also exempt under FOISA. This is a request for access, termed a Subject Access Request (SAR), the processing of which is documented in the next section.

Where information is requested by an organisation for a particular purpose, for example, requested by the police for the prevention and detection of crime, processing must still comply with the required elements of Data Protection Law. In the event the police, or any other law enforcement agency, request access to personal data it must be demonstrated that the relevant exemption(s) apply in each circumstance. In each case of receiving a request to access personal data (even where a third party does not require a copy, for example, a request to view a personnel file), evidence of compliance with Data Protection Law should be fully documented and retained on the appropriate file alongside the personal data that was disclosed.

If any other third parties request access to personal data, the sharing of data must comply with Data Protection Law and is likely to be required to be subject to an exemption to allow the sharing to take place. Advice should be taken in each instance from the Head of Finance and Corporate Affairs.

comhairle iarraidh gach turas bho Cheann an Iomhais is Cùisean Corporra.

8 Còraichean an Neach ris am buin an Dàta Rights of the Data Subject

Tha grunn chòraichean aig na daoine ris am buin an dàta fon UK GDPR. 'S iad sin:

Gum faigh iad fiosrachadh air mar a thèid am fiosrachadh pearsanta aca a chleachdadh nuair a bheir iad seachad e. Gheibhear fiosrachadh mu mar a làimhsicheas Bòrd na Gàidhlig fiosrachadh mun luchd-obrach aige ann am poileasaidhean na buidhne agus gheibhear tuilleadh fiosrachaidh air eadar-lìon na buidhne;

- A' chòir an dàta agaibh fhaicinn
- A' chòir an dàta agaibh a cheartachadh
- A' chòir an dàta agaibh a dhubhadh às
- A' chòir bacadh a chur air mar a thèid an dàta agaibh a chleachdadh
- A' chòir an dàta agaibh a ghluasad

Iarrtasan bho Dhaoine airson am Fiosrachadh Fhèin

Tha a' chòir aig duine sam bith, aig àm sam bith, lethbhreac iarraidh den dàta pearsanta a tha Bòrd na Gàidhlig a' cumail mun dheidhinn, canar Iarrtas bho Neach airson am Fiosrachadh Fhèin (SAR) ri seo.

Tha riathanasan laghail sònraichte ann a thaobh a bhith toirt seachad fiosrachadh mar fhreagairt do SAR agus dh' fhaodadh gum bi cuid a dh' fhiosrachadh a' tighinn fo shaoradh. Cuideachd, mar as trice feumar fios a chur gu daoine eile air a bheil iomradh san fhiosrachadh a thathar a' dol a thoirt seachad, mura gabh am fiosrachadh sin a dhubhadh às gun a bhith toirt buaidh air an dàta pearsanta a dh' iarr an neach-iarrtas. Gheibhear tuilleadh stiùiridh ann an Còd-obrach Oifis Coimiseanair an Fhiosrachaidh (ICO)

Data subjects have a number of rights under the UK GDPR. These are:

To be provided with information about how their personal information will be processed at the point it is obtained. Information about how Bòrd na Gàidhlig processes information about employees is contained in company policies with further information available from the intranet;

- A right of access;
- A right to rectification
- A right to erasure
- A right to restriction of processing
- A right to data portability

Subject Access Requests

Anyone has the right to ask for a copy of the personal data Bòrd na Gàidhlig is holding about them at any time, which is known as a subject access request (SAR).

There are specific legal requirements relating to the provision of information in response to a SAR and some information may be exempt from disclosure. It will usually also be necessary to consult any other third parties referred to in information that is to be provided, unless it can be redacted without compromising the provision of relevant personal data to the applicant. Further guidance is contained within the ICO's guidance on managing subject access requests, see Section 12.

airson Iarrtas bho Neach airson am Fiosrachadh Fhèin, faicibh Earrainn 12.

Mar as trice, gheibh luchd-obrach Bòrd na Gàidhlig cothrom air na faidhlichean pearsanta aca tro PeopleHR. Bu chòir cuimhneachadh, mus fhaighear cothrom air fiosrachadh sam bith eile, dh' fhaodadh gum feumar fios a chur gu daoine eile air a bheil iomradh san fhaidhle.

Employees of Bòrd na Gàidhlig can normally access their personnel files through PeopleHR. It should be noted that prior to providing access to any other information, it may be necessary to consult other third parties referred to in the information on file.

9 Margaidheachd

Tha ciall gu math farsaing aig margaidheachd fon ADD2018, agus tha e a' gabhail a-steach sanasachd no stuthan sanasachd a tha toirt amasan is feallsanachd na buidhne am follais a thuilleadh air a bhith dèanamh sanasachd air bathar is seirbheisean. Ma thèid dàta pearsanta a chruinneachadh air adhbharan margaidheachd, feumar a làimhseachadh a rèir chumhachan na h-ADD 2018. Nuair a thathar a' cleachdadh mheadhanan eileagtronaigeach an lùib obair margaidheachd, feumaidh an obair sin cumail ris na Riaghailtean airson Priobhaideachd is Conaltraidh Eileagtronaigich (PECR). Bidh sin a' gabhail a-steach fònachd gu daoine, facsaichean, brathan-teacs agus puist-d air adhbharan margaidheachd.

Marketing

Marketing has a very wide interpretation under Data Protection Law and covers all advertising or promotional material that promotes the aims and ideals of an organisation as well as products and services. If personal data is collected for marketing purposes, any processing must comply with the provisions of Data Protection Law. Where the marketing activity uses electronic media, it will also be covered by the Privacy and Electronic Communication Regulations (PECR). This will include any marketing telephone calls, faxes, texts and e-mails.

Ged a dh' fhaodadh cuid de dh'obair Bhòrd na Gàidhlig a bhith fo bhunait laghail obair phoblach, far a bheil e fo PECR, tha grunn riaghailtean ann ris am bu chòir dhuibh ealla a ghabhail mus cuir sibh stuthan margaidheachd gu daoine tro meadhanan eileagtronaigeach:

While some of Bòrd na Gàidhlig's work may fall under the lawful basis of public task, where it falls under PECR, there are a number of requirements that should be taken into consideration prior to sending out electronic marketing material:

- I. Feumaidh cead follaiseach a bhith aig buidheann bho dhaoine, agus fios aca dè tha iad a' ceadachadh, mus cuir a' bhuidheann stuthan margaidheachd thuca;
- II. Feumar an dàta a làimhseachadh ann an dòigh chothromach. Bidh sin a' ciallachadh, mar a bhios a' tachairt

- I. An organisation must have explicit and informed consent from the person they are directing the marketing material to;
- II. Processing of the data must be fair. This will mean that, as with the processing of all personal data, personal details will

leis gach uile dàta pearsanta nuair a thathar ga làimhseachadh, gun d' fhuair am fiosrachadh pearsanta ann an dòigh laghail sa chiad dol a-mach. Gu h-àbhaisteach, bidh feum air brath-prìobhaideachd. Innsidh am brath sin do dhaoine, aig am àm a bheir iad cead seachad, dè an dòigh gu mionaideach san tèid an dàta pearsanta aca a chleachdadh.

have been obtained lawfully in the first instance. This usually requires provision of a privacy notice. The notice will inform people, at the time they give their consent, exactly how their personal data will be used;

III. Feumaidh roghainn a bhith an cois gach brath-conaltraidh a thaobh margaidheachd gum faodar roghnachadh gun a bhith faighinn an còrr fiosrachadh margaidheachd.

III. Every marketing communication must give people the option to opt out of receiving further marketing information.

Bu chòir cuimhneachadh nach eil PECR a' buntainn ri margaidheachd a chaidh iarraidh (margaidheachd a chaidh iarraidh a dh' aona-ghnothach). Gheibhear tuilleadh stiùiridh air margaidheachd san Stiùiridh airson Rian a Chumail air Liostaichean-conaltraidh agus air làrach-lìn Oifis Coimiseanair an Fhiosrachaidh (ICO), faicibh Earrainn 12.

It should be noted that the PECRs do not apply to solicited marketing (marketing that has been specifically requested). Further guidance on marketing can be found on Guidance on Managing Contacts Lists and on the ICO's website, see Section 12.

10 Clàradh

Mar rianadair dàta, tha aig Bòrd na Gàidhlig ri clàradh le ICO. Thèid an clàradh seo ath-sgrùdadh gach bliadhna agus ùrachadh mar a bhios feum air sin.

Registration

As a controller, Bòrd na Gàidhlig is required to register with the ICO. This registration reviewed annually and updated as required.

11 Chumhachan dàta pearsanta a thèid a bhristeadh

Faodaidh dubh-dhuilgheadas a bhith ann ri linn cumha sam bith a thèid a bhristeadh bho na Laghan Dìon Dàta, agus dh' fhaodadh càin airgid nach beag a bhith ann airson sin. Dh' fhaodadh cuideachd gun tog neach no buidheann eile, a dh' fhuiling cron ri linn bristeadh nan cumhachan, cùis lagha an aghaidh Bhòrd na Gàidhlig agus iad a' sireadh airgead-dìolaidh.

Personal Data Breaches

Breaches of Data Protection Law are extremely serious and may result in a significant monetary penalty. Bòrd na Gàidhlig may also be sued by a third party that has suffered actual harm as a result of a breach.

Am measg nan dòighean sam faodar na cumhachan a bhristeadh tha:

Examples of breaches may include:

- Dàta pearsanta, no uidheamachd air a bheil dàta pearsanta, air a chall no air a ghoid;
- Modhan-smachd neo-iomchaidh gus smachd a chumail air cò gheibh cothrom air dàta;
- Mearachd a nì cuideigin;
- Hagadh;
- “Blagging” (nuair a gheibhear fiosrachadh pearsanta bho Bòrd na Gàidhlig tro fhoill);
- Nuair a cho-roinneas luchd-obrach fiosrachadh pearsanta le cuideigin, agus nach fheum fios a bhith aca air, agus dh’ fhaodadh an neach sin a bhith nan neach-obrach eile, nan cunnradair no nan neach-cleachdaidh;
- Tha am fiosrachadh mearachdadh agus chan eil e air ùrachadh;
- A’ cumail fiosrachadh nas fhaide na tha feum air;
- A’ cur fiosrachadh gu dùthaich taobh a-muigh Raon Eaconamach na h-Eòrpa far nach eil laghan freagarrach aca airson dìon dàta;
- Mura h-innsear do Choimiseanair an Fhiosrachaidh mu bhith call fiosrachadh no mu bhith ga fhoillseachadh/ga co-roinn ann an dòigh mhì-laghail.
- Loss or theft of personal data or equipment that is being used to store personal data;
- Inappropriate access control;
- Human error;
- Hacking;
- Blagging (where personal information is obtained from Bòrd na Gàidhlig through deception);
- Employees sharing personal information with someone that doesn’t need to know, which may include another employee, contractor or customer;
- Information not being accurate and up to date;
- Keeping information longer than required;
- Information being sent to a country outside the EEA and which does not have acceptable data protection law;
- Not reporting losses or unlawful disclosure/sharing of information to the Information Commissioner.

Ann an cuid a shuidheachaidhean, bidh e riatanach gu tèid innse do ICO mu bhristeadh ann an tèarainteachd dàta no de riaghailtean dàta taobh a-staigh 72 uairean a thìde. Bu chòir smachd a ghabhail air bristeadh sam bith, innse mu dheidhinn san spot, agus dèiligeadh ris a

In some circumstances, it is mandatory to report data breaches to the ICO within 72 hours. Any breaches should be contained, reported immediately, and dealt with in accordance with the Data Breach Investigation Procedures, and the ICO’s Guidance on Breach Response and Monitoring, see Section 12.

rèir Stiùireadh ICO air mar a Laimhsichear Bristeadh ann an Tèarainteachd Dàta, faicibh Earrainn 12.

12	Sgrìobhainnean Buntainneach	Relevant Documents
	Stiùireadh ICO air:	ICO guidance on:
	Còd-obrach airson Dàta a cho-Roinn Còd-obrach airson iarrtas bho Neach airson am Fiosrachadh Fhèin- https://ico.org.uk/media/for-organisations/documents/2619803/right-of-access-1-0-20210520.pdf	Data Sharing Code of Practice Subject Access Request Guidance - https://ico.org.uk/media/for-organisations/documents/2619803/right-of-access-1-0-20210520.pdf
	Stiùireadh OCF air Margaidheachd Dhìreach – https://ico.org.uk/media/for-organisations/documents/1555/direct-marketing-guidance.pdf	ICO Guidance on Direct Marketing - https://ico.org.uk/media/for-organisations/documents/1555/direct-marketing-guidance.pdf
	Còd-obrach airson a bhith Dèanamh Measaidhean air a' Bhuaidh air Priobhaideachd https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/	Conducting Data Protection Impact Assessments - https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/
	Stiùireadh air mar a làimhsichear Bristeadh ann an Tèarainteachd- https://ico.org.uk/for-organisations/accountability-framework/breach-response-and-monitoring/	Guidance on Personal Data Breaches - https://ico.org.uk/for-organisations/accountability-framework/breach-response-and-monitoring/
	Stiùireadh taobh a-staigh: Stiùireadh mu bhith a' riaghladh liostaichean luchd-fios	Internal guidance: Guidance on Managing Contacts Lists
	Fiosrachadh mu Phriobhaideachd Bòrd na Gàidhlig	Bòrd na Gàidhlig Privacy Notices
	Clàran Glèidhidh Bòrd na Gàidhlig	Bòrd na Gàidhlig retention schedules
	Modhan Sgrùdaidh Briseadh Dàta Bòrd na Gàidhlig	Bòrd na Gàidhlig Data Breach Investigation Procedures

13 Smachd Sgrìobhainn

Document Control

Dreach <i>Version Number</i>	Adhbhar/ Atharrachadh <i>Purpose/Change</i>	Ùghdar <i>Author</i>	Ceann-là <i>Date</i>
3.1	Ùrachadh leis an lagh as ùire	Liz Taylor	02-2022



***Poileasaidh Rianachd Fiosrachaidh is Clàran
Information & Records Management Policy***

Air aontachadh le/Approved by:
Air aontachadh air/Approved on: 01-2017
Ath-nuadhachadh a dhìth/Review due on:
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Clàr-innse:	Contents:	
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1**Purpose**

Records management is vital for the delivery of Bòrd na Gàidhlig's services in an orderly, efficient, and accountable manner. Effective records management will help ensure that Bòrd na Gàidhlig has the right information at the right time to make the right decisions. It will provide evidence of what Bòrd na Gàidhlig do and why, therefore protecting the interests of the organisation, Bòrd na Gàidhlig's staff and all those who interact with Bòrd na Gàidhlig.

Records, and the information they preserve, are an important corporate asset. Bòrd na Gàidhlig is committed to establishing and maintaining record-keeping practices that meet operational needs, accountability requirements and stakeholder's expectations, and to meet this commitment will:

- create and manage records efficiently
- ensure staff have the access to the necessary information and records to perform their tasks
- protect and store records securely
- make records accessible to the general public where possible
- identify records for archive and permanent preservation
- dispose of records safely in accordance with defined retention schedules

Bòrd na Gàidhlig has been taking steps to implement a records management plan (RMP), as required by the Public Records (Scotland) Act 2011 (the Act). Bòrd na Gàidhlig will strive to ensure that, in addition to meeting legal requirements, recommended best practice with regards to records management is incorporated into the plan. Additionally, Bòrd na Gàidhlig will seek to follow the principles and practices set out in Code of Practice on Records Management issued by the Scottish Executive under section 61 of the Freedom of Information (Scotland) Act 2002 and aims to balance a commitment to

openness and transparency with corporate responsibilities.

2

Scope

This policy applies to all employees of Bòrd na Gàidhlig (both permanent and temporary), contractors, consultants, secondees and any other third party that has access to Bòrd na Gàidhlig's records, wherever these records may be located.

This policy, together with the associated standards, applies to the management of records, in all technical or physical formats or media, created or received by Bòrd na Gàidhlig in the conduct of its business activities.

Although not an exhaustive list, examples of items that can constitute records include:

- Documents (including written and typed documents and annotated copies)
- Computer files (including word processor files, databases, spreadsheets, and presentations)
- Paper based files.
- Electronic mail messages
- Diary records
- Fax messages
- Reports
- Intranet and Internet Web pages

3

Summary of the Records Management Plan

As laid down by the Act, Bòrd na Gàidhlig has developed an RMP which was approved on an improvement model basis by the Keeper of the Records of Scotland in 2013. The RMP consists of 14 elements:

1. Senior management responsibility
2. Records manager responsibility
3. Records management policy statement
4. Business classification
5. Retention schedules
6. Destruction arrangements
7. Archiving and transfer arrangements

8. Information security
9. Data protection
10. Business continuity and vital records
11. Audit trail
12. Competency framework for records management staff
13. Assessment and review
14. Shared information

This policy document addresses elements 1 – 3 of the plan and provide a framework for the implementation of the other elements of the RMP.

4

Records Management in Practice

The underlying principle of records management is to ensure that a record is managed through its life cycle from creation or receipt, through maintenance and use to disposal.

Good records management relies on the following:

- the creation of appropriate records
- the capture of records (received or created) in record keeping systems
- the appropriate maintenance and upkeep of these records
- the regular review of information
- the controlled retention, archiving and permanent preservation of information
- the controlled destruction of information.

Through adhering to these principles, Bòrd na Gàidhlig will benefit from:

- records being easily and efficiently located, accessed and retrieved
- information being better protected and securely stored
- records being disposed of safely and at the right time.

5

Legislation

Seisean Fosgailte
Cuspair 3.1 PT2

This policy has been written to meet the requirements of elements 1 – 3 of Bòrd na Gàidhlig's RMP. Other supporting documents that contribute to the plan are:

- business classifications
- the corporate file plan
- retention and destruction schedules
- data protection policy
- file naming conventions
- shared information
- guidance documents to provide more detail to staff about managing records and information
- draft contractor clauses to be used where appropriate when procuring services

Bòrd na Gàidhlig also acknowledges the laws and codes of practice listed in the annex to this policy that relate to records and information, including the Gaelic Language (Scotland) Act 2005, which established Bòrd na Gàidhlig. Bòrd na Gàidhlig will develop and maintain record keeping systems that capture and maintain records with appropriate evidential characteristics in accordance with its obligations under these pieces of legislation.

6

Record keeping Systems

Standards defining records management practice in the following areas are being adopted by Bòrd na Gàidhlig, which will be implemented using appropriate records management guidance, tools, and systems:

- Determining what constitutes a record
- Version control
- Determining how long to retain records
- Vital records
- Indexing/classification
- Storage and handling
- Access and security
- Tracking

- Disposition

Bòrd na Gàidhlig uses SharePoint to manage documents and records, which provides secure access for those requiring access to Bòrd na Gàidhlig's information together with the necessary audit trails to demonstrate how records have been managed.

7

Language

In accordance with the Gaelic Policy, Bòrd na Gàidhlig's primary operating language is Gaelic. As Bòrd na Gàidhlig works with, and provides services for, non-Gaelic speakers, documents, information, and records are held in the English language and in some instances in both Gaelic and English.

Where records are held in more than one language, the version that should be considered the authoritative version unless marked otherwise is in the following order of precedence:

- Gaelic
- Bilingual (Gaelic and English)
- English

8

Version Control

Where it is necessary to retain multiple drafts of a document (for example to demonstrate an audit trail), the final version of the document will be marked appropriately. This includes any documents where the documents are held in multiple language formats. Keywords (also known as tags) that are available in SharePoint should be used to ensure all staff are aware of the existence of other language versions, helping to ensure that where updates are required, all versions of the document are updated.

9

Destruction and Archiving Arrangements

Secure hard copy destruction of documentation is currently carried out under the Memorandum

Seisean Fosgailte
Cuspair 3.1 PT2

of Understanding (MoU) held with NatureScot. Electronic destruction of material will be carried out using facilities within SharePoint.

Bòrd na Gàidhlig has an MoU with National Archives Scotland for archiving services, and arrangements are being implemented to transfer to archive or permanent preservation both hard copy and digitally born records.

10

Business Continuity and Vital Records

Hardware, software and storage of electronic information is contracted out by Bòrd na Gàidhlig. Business continuity requirements for hardware and software are dealt with by Microtech.

A business continuity plan that draws all contracts together has been drafted by the Head of Corporate Services, which is supported by the List of Vital records at Appendix 2.

11

Roles and responsibilities Bòrd na Gàidhlig

The Ceannard has overall responsibility for the policy and the Bòrd is responsible for its authorisation. To support the policy, Bòrd na Gàidhlig will ensure that all staff receive appropriate records management training. Bòrd na Gàidhlig will also provide supporting standards, procedures and guidelines, and monitor compliance with them.

Management

Head of Corporate Services is responsible for policy implementation, the day-to-day management of the policy and ensuring that a suitable records management programme is implemented.

The SMT is responsible for supporting and monitoring record keeping practices as defined by this policy.

Seisean Fosgailte
Cuspair 3.1 PT2

Other employees

The Records Manager is responsible for overseeing the design, implementation, and maintenance of this policy, as well as monitoring compliance and providing training.

The policy aims to ensure that all staff and members are aware of what they must do to manage records in an effective and efficient way. All staff are responsible for the creation of accurate and reliable records as defined in this policy.

Contact details

Ceannard (CEO): Ealasaid MacDonald
ealasaid@gaidhlig.scot

Head of Finance and Corporate Affairs: Nicola Pearson
nicola@gaidhlig.scot

Compliance Manager: Carol Johnson
carol@gaidhlig.scot

All Bòrd na Gàidhlig staff can also be contacted through the main switchboard number 01463 225454 with further contact information available from Bòrd na Gàidhlig's website <http://www.gaidhlig.scot>.

Third parties interacting with Bòrd na Gàidhlig

Anyone with access to Bòrd na Gàidhlig's records, which may include but is not limited to contractors, consultants and secondees, are responsible for ensuring they do so in accordance with Bòrd na Gàidhlig's records management policy, standards, and procedures.

12

Monitoring and Review

This policy will be continuously monitored to ensure it remains fit for purpose and will be reviewed annually or on any changes to relevant codes of practice or legislation.

13 Pàipearan-taic

Appendixes

Appendix 1 - Legislation Relating to Information and Records

Seisean Fosgailte
Cuspair 3.1 PT2

Civil Evidence (Scotland) Act 1988
Companies Acts 1985 and 1989
Consumer Protection Act 1987
Copyright, Designs and Patents Act 1988
Data Protection Act 2018
Environmental Information (Scotland)
Regulations 2004
Equality Act 2010 (and related regulations)
Financial Service Act 1986
Freedom of Information Act (Scotland) 2002
Gaelic Language (Scotland) Act 2005
Health and Safety at Work Act 1974 (and related
regulations)
Human Rights Act 1998
Limitation Act 1980
Prescription and Limitation (Scotland) Acts 1973
and 1984
Regulation of Investigatory Powers Act 2000
Re-Use of Public Sector Information Regulations
2015
Social Security Contributions and Benefits Act
1992
Taxes Management Act 1970
UK General Data Protection Regulation
Unfair Contract Terms Act 1977
Value Added Tax Act 1994

Appendix 2 – List of Vital Records

Immediate

Next of kin records
Contact details for those assigned
responsibilities in the Business Continuity Plan,
including any NatureScot contacts
Key contacts list (including Bòrd members,
Ceannard and Government Sponsor
Department)
Emergency contact lists for groups Bòrd na
Gàidhlig is working with
All staff contact details
Insurance documents
Annual profile
Grant-in-aid

5 working days

Grant agreements

PBG agreements
Payroll files
Invoice files

Information and Records Management Guidance

What is the difference between information and records?

Not all information created while carrying out the Bòrd na Gàidhlig's business will become a record. For example, personal emails, ephemeral information such as: train timetables etc do not form part of the corporate memory of the Bòrd, are not records, and should not be kept for longer than is absolutely necessary.

All Bòrd staff should have adequate arrangements in place for documenting their activities.

To decide whether something is a record, look at it in the context of:

- The regulatory environment;
- Business and accountability requirements; and
- The risk of not keeping it, i.e. would anyone need to retrieve the information again.

ISO 15489:1 (2016) defines a record as:

“...information created, received and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of business”

In this guidance, the term document is used to refer to instances where the guidance may apply to either information or a record.

Why do we need to manage records?

Maintaining appropriate and effective records management practices will help us to deliver and

Seisean Fosgailte
Cuspair 3.1 PT2

meet our statutory duties and support all staff. By adopting the RM policy, we aim to ensure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- a. help us carry out our business
- b. help us to make informed decisions
- c. protect the rights of employees, regulated entities, and the public
- d. track policy changes and development
- e. make sure we comply with relevant legislation
- f. provide an audit trail to meet business, regulatory and legal requirements
- g. make sure that we work effectively as a regulator and prosecuting authority and meet our lawful obligations for disclosing evidence
- h. support continuity and consistency in management and administration
- i. make sure we are open, transparent and responsive
- j. support research and development
- k. promote our achievements

What is version control?

In certain circumstances it is necessary to keep successive drafts of a document, for example: NGLP development, to provide evidence of the process and as an audit trail of the input from stakeholders.

The need to keep successive versions of items should be based on the business needs of the department who creates the record and should be documented in local procedures. It is worth noting that drafts of documents can be requested under the Freedom of Information Act 2002, and thus, if drafts are held, they need to be reviewed if requested for release.

What is a “vital” record?

A vital record is one that is essential to the continued operation of the Bòrd following a total

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loss of services or in the event of a disaster. The vital records in all departments must be identified and protected as much as is possible to minimise the risk of loss in the event of a disaster.

Protection of vital paper records could be in the form of secure physical storage, for example a fire-resistant cabinet, or for vital electronic records, the maintenance of backup copies stored in different locations.

How do I know if I can share information or records?

Most documents held by Bòrd na Gàidhlig are likely to be provided if requested, however, any provision of Bòrd na Gàidhlig information to any third party must always go through the appropriate approval procedures. The reason any data sharing must be approved is that the documents may contain sensitive or personal information that may require to be redacted, and some instances of sharing may require data sharing agreements to be in place.

How do I know how long information or records should be retained for?

All records will have a retention period, which is the length of time a record must be kept. A retention period is determined by either legal requirements, third party or business requirements. It is important to note there can be variations within a record set, for example, any records relating to the provision of funding will be kept for a minimum of 6 years from the end of the current financial year, however, if there is EU funding involved the retention period may be significantly longer.

All records should be included in one of the Bòrd na Gàidhlig's retention schedules. In practice, retention periods are usually assigned at the file level, with any information in the file weeded out

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as appropriate when it no longer has a business use.

If you have any queries relating to retention period that should be assigned to records you are closing, contact Carol Johnson.

Information (anything that does not constitute a record) should only be retained for as long as it has a purpose.

Who is responsible for the destruction of information and records?

Destruction should always be completed using the corporate procedures in place as official records need to be kept that state when and how records were destroyed, and that were destroyed in accordance with the Bòrd's retention schedules. These destruction records are required regardless of whether information is in hard copy or held electronically. All staff are responsible for assigning retention periods and marking information for destruction; however, staff should not destroy any records they are able to access without the appropriate authorisation.

Which records should I retain in hard copy?

Records that should be retained in hard copy include any legally binding contractual documentation that was entered into by either party by providing a physical signature. (Note that contracts can be entered into using an electronic medium, however, where the legally binding document is in hard copy, it must be retained in hard copy.) Examples may include:

- Employment contracts
- Funding agreements
- Contracts for services

Other records that must be retained in hard copy include any information where a signature has been obtained to demonstrate responsibility for something which may be legally binding, for

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example, health and safety records such as an accident book.

Receiving hard copy information with a signature does not necessarily mean the document must be held in hard copy, the test is whether the document is a legally binding contract. An example of information that does not require to be held in hard copy that may be signed are the provision of bank details.

Smachd Sgrìobhainn/Document Control

Dreach <i>Version Number</i>	Adhbhar/Atharrachadh <i>Purpose/Change</i>	Ùghdar <i>Author</i>	Ceann-là <i>Date</i>



Poileasaidh Fhaclan-Faire
Password Policy

Air aontachadh le/Approved by:

Air aontachadh air/Approved on:

Ath-nuadhachadh a dhìth/Review due on:

Eadar-theangachadh dearbhte/translation checked:

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