



# **SAFEPOD NETWORK**

S E C U R E   D A T A   A C C E S S

## **SPN registration and bookings Governance Statement**

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## Version control

Updates to this document will be summarised in the table below.

Version No.	Name	Date	Update
1.0	Darren Lightfoot	14.05.21	First version
1.1	Darren Lightfoot	19.05.21	Minor revisions
1.2	Darren Lightfoot	09.06.21	Updated document for SafeSpace
1.3	Darren Lightfoot	27.06.23	Updated SafeSpace to SafePoint
1.4	Darren Lightfoot	19.03.24	Minor updates to document

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## Introduction

This statement explains how personal data will be used fairly and lawfully in-line with UK data protection law, for SPN registrations and bookings of SPN Services (such as SafePods and SafePoints).

## Controllers

Controllers for personal data are:

- **The University of St Andrews**, where they have:
  - (i) Processed applications for SPN User registrations.
  - (ii) Created SPN User records.
  - (iii) Collected and recorded details of individuals who are the points of contact at a Data Centre or a SafePod Network Organisation.
  - (iv) Collected and recorded details of individuals who are contractors.
- **Data Centre**, where they have:
  - (i) Assessed and made a decision on a provisional booking.
  - (ii) Reviewed bookings.
  - (iii) Cancelled bookings.

## The legal basis for the use of personal data for SPN registration records and bookings

The University of St Andrews has determined that Contract is the legal basis for personal data processed as a Controller for SPN registrations and bookings.

It is for each other Controller to determine the legal basis for processing; that said it is anticipated that in most instances Contract will be an appropriate basis.

## SPN booking system and record management

The University of St Andrews provides and maintains (via a contractor) the SafePod Network (SPN) website, which also provides online booking services.

The University will create and maintain SPN registration records for the provision and administration of bookings. The types of SPN registrations are:

- SPN Users (typically Researchers).
- Data Centre administrators (persons that confirm a booking and determine access conditions to a SPN Service).
- Coordinators (persons that provide the operational management and access to a SafePod or SafePoint).
- Contractors (persons that repair faults to a SPN Service).

An individual can request registration as a SPN User. Once the registration process is approved by the SPN, then a SPN User can then make provisional bookings from the SPN website.

The relevant Data Centre administrator will then receive email notification of a provisional booking to access their data from a SPN Service. At their sole discretion, a Data Centre

administrator can then confirm or reject a booking (including determining access conditions) through the SPN website. Where confirmed, an email is then sent to the Researcher and relevant coordinator with the booking details and access conditions.

A Data Centre administrator can access details of current and past bookings at any time via the SPN website. Additionally, the website contains contact details for coordinators for the management of their SafePod or SafePoint, and contractors that undertake repairs to a SPN Service. These details are shared with individuals registered with the SPN as appropriate for the operation and management of the SPN.

### **Data Centre access to the SPN booking system**

Each Data Centre administrator will have access to the SPN online booking system. Access is controlled by username and password. Those details are confidential and must not be shared or made known to any other individual. Passwords must be created and it is advised that these should be constructed in accordance with guidance issued by the National Cyber Security Centre 'three random words'.

### **Data protection rights**

The University of St Andrews will provide a SPN User with their data protection rights, for all personal data held on records maintained within the online booking system. Requests to exercise data protection rights or questions on those rights can be directed to [safepodnetwork@st-andrews.ac.uk](mailto:safepodnetwork@st-andrews.ac.uk).

Data Centres and SafePod Network Organisations are Controllers for the personal data of their employees or contractors (i.e. contact details), held within the SPN website.

### **Processors**

Each SafePod Network Organisation is a Processor when in receipt of and using booking details and access conditions to their SPN Service. The Controller for those details being the relevant Data Centre.

Booking details and access conditions are sent by email to the coordinators at the relevant organisation. The booking details can also be viewed from the SPN website. Access is controlled by username and password.

### **Records retention**

The University of St Andrews has a records retention schedule for the SPN scheme, which is available on request.

### **Passwords**

Where an individual registered with the SPN suspects or finds that their password to access the SPN booking system has become lost or stolen, they must immediately email the SPN at [safepodnetwork@st-andrews.ac.uk](mailto:safepodnetwork@st-andrews.ac.uk).

### **Transparency**

Privacy notice details are provided when an individual registers to become a SPN User and when bookings are made via the SPN website.

Privacy notice details are also provided to Data Centre administrators, SafePod Coordinators and SafePoint Coordinators when they register with the SPN website.

### **Processor contract**

The University of St Andrews has engaged a third party to provide and maintain the SPN website and booking system. A 'Processor' contract which contains the contractual provisions mandated by UK General Data Protection Act, Article 28, is available on request.

### **Data Privacy Impact Assessment ("DPIA")**

The DPIA for the scheme is available on request.

## SPN contact information

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