

Handbook

Policy Name: Data Protection Policy

Policy Statement

Ballincollig Family Resource Centre CLG is committed to the protection and welfare of our service users, staff, and volunteers. As part of this commitment Ballincollig Family Resource Centre CLG will comply with relevant legislation and recommended best practice in the utilization of internet within the organization.

Purpose

The purpose of this document is to provide information and guidance on Data Protection policy and procedures governing employment, volunteerism, service access and participation within Ballincollig Family Resource Centre CLG

Scope

This policy applies to Ballincollig Family Resource employees, volunteers, service users, members while utilising Ballincollig Family Resource Centre CLG IT facilities whether on or off site.

Officers responsible within the organisation: Hilary Fitzgerald Project Co-ordinator Ballincollig Family Resource Centre CLG, all members of the Senior Team within Ballincollig Family Resource Centre CLG are expected to facilitate and support the implementation of this policy.

Data Protection Policy

The Ballincollig Family Resource Centre CLG is committed to protecting the rights and privacy of individuals in accordance with both EU and Irish data protection legislation. The organisation needs to lawfully and fairly process personal data about employees, clients, suppliers and other individuals in order to achieve its mission and functions.

The data protection legislation confers rights on individuals as well as responsibilities on those persons processing personal data. This policy sets out how the organisation seeks to process personal data and ensure that staff understand the rules governing their use of personal data to which they have access in the course of their work.

The EU General Data Protection Regulation (GDPR EU 2016/679) replaces the Data Protection Directive 95/46/EC and was designed to harmonise data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organisations across the region approach data privacy. The GDPR came into effect on 25th May 2018. This version of the organisation's policy has been updated to reflect the GDPR.

The Ballincollig Family Resource Centre CLG is a community-based organisation providing an integrated range of services for those living in the greater Ballincollig area. The Ballincollig

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Family Resource Centre CLG employs a staff team of 18 people, and also enjoys the support of many volunteers. It is a registered charity and limited company and is funded through service income, fundraising and government grants.

The Ballincollig Family Resource Centre CLG is committed to protecting and respecting your privacy. As part of our on-going commitment, we have prepared this Data Protection Policy to help you understand how we manage your personal information in compliance with data protection legislation.

All staff, volunteers, contractors and relevant third parties are required to ensure this policy is implemented and adhered to.

1. Responsibility for this policy

The Board of Directors and the Ballincollig Family Resource Centre CLG are committed to compliance with all relevant EU and Irish laws in respect of personal data, and the protection of the rights and freedoms of individuals whose information the organisation collects and processes.

The Project Co-ordinator – Hilary Fitzgerald and the members of the Senior Team are responsible for ensuring that this policy is implemented on an operational level and the designated data controllers in each department have responsibility for the appropriate collection, processing, and storage of any personal data.

Managers at all levels will be accountable for being able to demonstrate that this policy has been implemented. All members of staff have a responsibility to comply with the organisation's data protection policies.

2. Type of information we collect

We may ask for or hold personal information about you to support delivery of high-quality supportive services and care. This information is given directly by you, healthcare professionals, family/relatives and governmental agencies.

The type of information we collect may include personal data which identifies you or can be used to identify or contact you. It may include:

- Name, date of birth, address and contact details
- Next of kin/relatives contact details
- Notes regarding contact which we may have had with you i.e. appointments, meetings and home visits
- Notes and reports about your medical, health and social care needs and wishes
- Information from caregivers/relatives and health care professionals involved in your life
- Personal sensitive information such as: religion/beliefs, financial, disability status, marital status, employment and recruitment related details and other personal sensitive information disclosed to us

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Such information is only collected from you if you voluntarily submit it to us via our website or directly to one of our staff members.

3. How and why we use the information you provide

We process the personal data you provide to us for the following purposes:

- To provide a high-quality service to you
- To register your interest in and communicate with you about
 - our services
 - our campaigns and advocacy work
 - our fundraising events and activities
 - our training courses/ workshops and our publications
 - our volunteer opportunities
 - our conferences and other Ballincollig Family Resource Centre events and programmes
- To market to you according to your preferences
- To process your job or volunteer placement applications
- To process your request for research application
- To respond to your queries and information requests
- To respond to any feedback, you provide or a complaint you make.
- To conduct research and analysis to monitor the performance of our campaigns, appeals, events and products

The Ballincollig Family Resource Centre CLG will process your personal data based on the following grounds:

- Your consent - where processing is based on your consent, you have the right to withdraw that consent
- Where it is necessary for the performance of a contract
- Where it is necessary for compliance with a legal obligation which [Organisation] is subject
- Where it is in the Ballincollig Family Resource Centre CLG legitimate interest to:
 - provide you with information necessary for any service or event you sign up for
 - provide you with information about any fundraising activities or campaigns that you have agreed to take part in
 - administer and record your donation and to keep a record of your relationship with us
 - assess employee and volunteer applications and recruit employees and volunteers
 - follow up with your queries
 - assess our fundraising activities

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4. Job Application Data

All documentation received by the Ballincollig Family Resource Centre CLG in relation to job applications will be processed in accordance with Data Protection legislation. The information will only be used by the Ballincollig Family Resource Centre CLG for its legitimate interests, in the processing of job applications and for ongoing administrative purposes with job candidates. If you are offered a job by the Ballincollig Family Resource Centre CLG this information will be added to your employee file, otherwise it will be retained for a year from close of the application process.

5. How long will the Ballincollig Family Resource Centre CLG retain your personal data?

The Ballincollig Family Resource Centre CLG holds personal data for a range of time periods, these are guided by our statutory requirements for certain data (e.g., financial records, employment records or health and safety records), our contractual obligations and our business and risk management requirements.

6. Disclosure of information to third parties

We will not trade your personal details with third parties.

We may share your information with selected third parties including:

To provide a high-quality service to you, we may need to share information about you with others. Information may be shared with health and social care organisations, local authorities, and other supportive services on a strictly need to know basis and with your consent. We may also share information where we have a duty to comply with any legal obligation to disclose such information. Examples of those with whom we share information include:

- Analytics and search engine providers that assist us in the improvement and optimisation of our site
- Where we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with anonymized, aggregated information about our users. For example, we may use your email address to create a Facebook Custom Audience or a Lookalike Audience. This enables us to show you the Ballincollig Family Resource Centre CLG content when you visit Facebook. We provide your email address to Facebook to enable them to determine if you are a registered account holder with Facebook. We may also use your email address to create a Lookalike Audience, where targeted ads are sent to people on Facebook who have similar characteristics to people on our Custom Audience list. For Facebook Custom Audience and Lookalike Audience your email is sent in an encrypted format that is deleted by Facebook. There are two ways to prevent this use of your data, you can either contact the Ballincollig Family Resource Centre CLG. Updating your preferences will not guarantee that you never see the Ballincollig Family Resource Centre CLG content on social media, since

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the social media site may select you based on other criteria and without your data having been provided by the Ballincollig Family Resource Centre CLG.

Where data is transferred to another party, we ensure appropriate technical and organisational safeguards are used to protect your personal data.

7. Where we store your personal data

All information you provide to us is stored on secure servers. All digital data is stored on computers which are password protected. Paper files are kept in locked filing cabinets. Mobile phone numbers are sometimes saved on business phones which are key code protected. All

offices are locked by assigned personnel and only authorised personnel have access to these offices and cabinets therein.

Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. In order to safeguard your information, we will make any such transfers in strict compliance with data protection legislation with all appropriate contractual arrangements (Privacy Shield, Binding Corporate Rules, or Model Contracts) will be in place. By submitting your personal data for such purposes, you agree to this transfer, storing or processing. The Ballincollig Family Resource Centre CLG will take all reasonable steps necessary to ensure that your personal data is processed securely and in accordance with this Privacy Statement.

8. Security

Your personal data is held on a secure server hosted by our hosting service provider, Fortuity. The nature of the Internet is such that we cannot 100% guarantee or warrant the security of any information you transmit to us via the Internet to be secure. However, once we receive your personal data, we take all reasonable technical and organisational measures to protect personal data from loss, misuse, alteration, or destruction and to prevent any unauthorised or unlawful disclosure or processing.

9. Storage of Data

Disposal of data It is recommended that in general, files be retained for a minimum of seven years under the Data Protection Act, 2018. In addition, the Ballincollig Family Resource Centre CLG observes appropriate Retention Schedules in line with best practice and legislation where

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storage periods may be less than, or exceed, the seven-year retention period. See **Section 5** above.

10. Cookies

As you use our website – www.ballincolligfrc.org - technical details in connection with visits to this website are logged by our internet service provider for statistical purposes. No information is collected that could be used by us to identify website visitors. The technical details logged are confined to the following items:

- The IP address of the user's webserver
- The top-level domain name used (for example .org, ie, .com, .net, .biz)
- The previous website address from which the user reached us, including any search criteria used.
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- Click screen data which shows the traffic of users around this website (for example pages accessed and documents downloaded).
- The type of web browser used by the website user

The Ballincollig Family Resource Centre CLG will make no attempt to identify individual visitors, or to associate any technical details listed above with any individual please see our Cookie Policy for further information.

11. Right of access to and updating or deleting your personal data

You have the right to view, amend or delete personal data Ballincollig Family Resource CLG holds about you.

Under data protection legislation you have the following rights:

- The right to be informed
- The right to access information
- The right to rectification
- The right to erasure
- The right to data portability
- The right to object to the processing of personal data
- The right of restriction
- Rights in relation to automated decision making, including profiling
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For further information on your rights see www.gdprandyou.ie or www.dataprotection.ie
In order to exercise your rights please put your request in writing to the Project Co-ordinator coordinator@ballincolligfrc.org

You also have the right to lodge a complaint to the office of the Data Protection Commission.

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12. Responsibilities of the Data Protection Officer

The organisation has assigned responsibility for Data Protection to Hilary Fitzgerald the Project Co-ordinator. As the Project Co-ordinator and Data Protection Officer, she will report to Board of Directors within the organisation concerning the tasks allocated to them.

The responsibilities of the Data Protection Officer will include the following:

- Keeping the Board of Directors and where designated sub-committees of the management board updated about data protection responsibilities, risks and issues
- Act as an advocate for data protection within the organisation
- Monitoring compliance with the relevant data protection legislation
- Monitoring that all data protection policies and policies are reviewed and updated on a regular basis
- Monitoring that the organisation provides appropriate data protection training and advice for all staff members and those included in this policy
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- Providing advice where requested as regards the data protection impact assessments and monitoring that such assessments are completed to an appropriate standard
- Provide advice on data protection matters from staff, board members and other stakeholders
- Responding to individuals such as clients and employees who wish to know which data is being held on them by the organisation
- Monitoring that appropriate data processing agreement are put in place with third parties that handle the organisation's data and ensuring that reviews are carried out of third parties on a regular basis
- Monitoring that the record of data processing activities (ROPA) is updated regularly
- Acting as a contact point and providing cooperation with the Data Protection Commissioner

13. Responsibilities of staff and similar parties

Anyone who processes personal data on behalf of the organisation has a responsibility to comply with this Data Protection policy.

All staff will receive training on this policy. New staff members/volunteers/student placements/other will receive training as part of the induction process. Completion of training is compulsory. Also, staff are continuously reminded of data protection obligations through annual data protection obligations for signing, emails to staff and annual obligations' notice.

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14. Related Policies

This policy is also linked to the following policies:

- Cookies Policy
- Social Media Policy
- Email Policy
- Internet Access Policy
- Mobile Phone/Device Usage Policy
- Confidentiality Policy, and
- Complaints' Policy

15. Contact Us

Please contact us if you have any questions regarding this privacy statement or your personal data using the information below:

Should you have any questions please feel free to contact Ballincollig Family Resource Centre Data Officer.

Who is the Data Protection Officer?

Ms Hilary Fitzgerald, Project Co-ordinator, Ballincollig Family Resource Centre CLG, The Village Centre Station Road, Ballincollig, Cork, P31 XP59.

Companies Reg Number CRN: 361290

Charity Number : CHY16573

Registered Charity Number - RCN : 20060053

Phone: 021-4876295. Email: coordinator@ballincolligfrc.org

15. Future Changes

This Data Protection Policy will be the subject of change to remain aligned to GDPR requirements, please check our website frequently to see recent changes.