Youthreach Sligo

Data Protection Policy

**Purpose**

This policy is a statement of Youthreach Sligo’s commitment to protect the rights and privacy of individuals in accordance with the Data Protection Act 1988 and the Data Protection ( Amendment ) Act 2003, and the Freedom of Information Act 2014. The Acts also impose responsibilities on those persons within organisations that process personal data. This policy should be read in conjunction with the Record Retention Policy of Youthreach Sligo.

**Scope**

This policy applies to all staff of Youthreach Sligo, particularly those who collect and / or control the contents and use of personal data.

**Definitions**

Personal Data; Any data relating to a living identifiable individual.

**Data**

Automated data or structured manual data.

**Manual Data**

Structured by reference to individuals in a way that makes data readily accessible.

**Data Controller**

A person who controls the content and use of personal data.

**Data Processor**

A person who processes personal data on behalf of a data controller.

**Data Subject**

An individual who is the subject of personal data.

**Processing**

Anything done with personal data, from collecting to disposal.

**Policy:**

Data Protection Principles;

Youthreach Sligo acknowledges its responsibilities and undertakes to implement the legislation in accordance with the eight stated Data Protection principles outlined in the acts as follows:

**Obtain and Process information fairly.**

Youthreach Sligo obtains and processes personal data fairly and in accordance with its statutory and other legal obligations.

**Keep it only for one or more specified, explicit and lawful purposes.**

Youthreach Sligo keeps personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes.

**Use and Disclosure only in ways compatible with these purposes.**

Youthreach Sligo only uses and discloses personal data in circumstances that are necessary for the purpose for which it collects and keeps the data.

**Keep it Safe and Secure.**

Youthreach Sligo takes appropriate security measures against unauthorized access to, or alteration, disclosure or destruction of data and against accidental loss or destruction.

**Keep it Accurate , complete and up to date.**

Youthreach Sligo operates procedures to maintain data as accurately, and as complete as possible.

**Ensure it is adequate, relevant and not excessive.**

Personal data held by Youthreach Sligo are adequate, relevant and not excessive in data retention terms.

**Retain for no longer than is necessary.**

Youthreach Sligo has a policy on retention periods for personal data.

**Give a copy of his / her personal data to that individual, on request.**

Youthreach Sligo has procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation.

**Responsibility**

Youthreach Sligo maintains overall responsibility for ensuring compliance with Data Protection legislation, when it is the Data controller of personal data. However all employees and students of Youthreach Sligo who separately collect and/or control the content and use of personal data are individually responsible for compliance with the legislation.

**Procedures**

Youthreach Sligo is committed to ensuring the protection of the privacy of personal data.

At the time of providing personal information, individuals are made aware of;

* The identity of the person who is collecting it
* That it will be kept on computer and in relevant filing systems
* The purpose for which it will be kept and used
* The persons or category of persons to whom it will be disclosed

Youthreach Sligo observes fully conditions regarding the fair collection and use of information.

* Meets its legal obligations to specify the purposes for which information is used
* Collects and processes appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirement

**Procedures for use and disclosure of information**

Youthreach Sligo uses the data obtained only in ways consistent with the purpose/s for which it is kept. Youthreach Sligo discloses the data only in ways consistent with that purpose/s.

**Procedures to ensure security of information held/used.**

**Youthreach Sligo has established appropriate security provisions to ensure that;**

* Access to Youthreach Sligo’s computers is restricted to authorized staff only
* Access to information is restricted to appropriate personnel
* Youthreach Sligo’s systems are password protected
* Youthreach Sligo’s server and network communications facilities are accessible to staff and IT support staff only
* Information on screens is kept hidden from callers to the office

**Procedures to ensure information is accurate and up to date**

Youthreach Sligo ensures the quality of information used

**Procedures to ensure information is adequate, relevant and not excessive**

Youthreach Sligo collects all information needed to serve our purpose effectively, and deals with individuals in a fair and comprehensive manner. Youthreach Sligo collects information that is relevant and not excessive for our specified purpose.

**Procedures to ensure information is not kept any longer than is necessary**

Youthreach Sligo has developed a Record Retention Policy, which lists all documents held and retention periods for these documents.

**Procedure to deal with a breach or accidental disclosure of personal information**

Youthreach Sligo acknowledges it’s intention to comply with the guidance proffered by the Data Protection Commissioner on their web site in relation to accidental disclosure of personal information. In the event that personal data for which Youthreach Sligo is responsible has been compromised, eg. through the loss of a portable device, Youthreach Sligo will respond as follows;

* Immediately notify the Data Protection Commissioner office by phone ( 1890 252231 ) or email ( info@dataprotection.ie )
* Inform those persons directly affected by the loss.
* Provide a detailed report of the incident to the data Protection Commissioner, including;
* The amount and nature of the data that has been compromised.
* What action ( if any ) has been taken to inform those affected.
* A chronology of the events leading up to the disclosure.
* A description of measures being undertaken to prevent a repetition of the incident.

**Procedure for right of access**

Requests will be date stamped, and acknowledges within 5 days.

Requests should be made in writing to the Data Protection Officer, detailing the information required. Requests are logged by Youthreach Sligo and the information is supplied to the requester within 40 days of receiving the request. The information will be provided in a form which will be clear to the requester. The requester must pay an access fee to MSLETB not exceeding €6.35. MSLETB is not obliged to refund any fee that it charges for dealing with access requests if it is determined that no data is kept. Fees will be refunded if MSLETB does not comply with the request, or if the personal data concerned must be rectified, supplemented or erased.

**Procedures for the disclosure of Youthreach Sligo controlled information to a third party**

These procedures form part of Youthreach Sligo’s Data Protection Policy and Procedures and apply to parties who wish to become disclosee’s of Youthreach Sligo controlled information.

The person or body who wishes to become a third party disclosee shall provide the following information in writing to the Data Controller of Youthreach Sligo in a timely fashion and at least 4 weeks in advance of the anticipated release of information.

* A copy of the applicants Data Protection Policy
* Details relating to the purpose(s) for which the data is requested
* A specification and definition of the data required
* A list of staff and others whom it is proposed will have access to the data whether in electronic or paper format
* A description of the security measures the data will enjoy
* The duration which it is proposed to hold each category of data
* The purging and deletion policy which applies to this data whether in electronic or paper format
* Any other information which the applicant deems appropriate.

Requested documentation to be forwarded to;

Mary Ganly

Mayo / Sligo / Leitrim ETB

Sub Office,

Quay Street,

Sligo.

**Review**

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.