

Data Protection Policy
YMCA Ireland

National Council of YMCAs Ireland | UK Charity Number XN45820 | RoI Charity Number 20026585 | Company Number NI 15660

DATA PROTECTION POLICY

Data protection is the safeguarding of the privacy rights of individuals about the processing of personal data.

YMCA Ireland is committed to ensuring Data collected and stored regarding users, staff and other stakeholders is treated with appropriate care, meeting its legal obligations under various Data Protection Acts. YMCA Ireland will strive to observe the law in all collection and processing of subject data and will meet any subject access request in compliance with the law.

YMCA Ireland will only use data in ways relevant to carrying out its legitimate purposes and functions as a charity in a way that is not prejudicial to the interests of individuals.

YMCA Ireland will take due care in the collection and storage of any sensitive data. National Council staff will do their utmost to keep all data accurate, timely and secure.

YMCA Ireland recognises that this policy covers data in both paper and electronic formats.

PURPOSE OF POLICY

The purpose of this policy is:

1. To provide a statement of intent outlining data collection, retention and management for YMCA Ireland.
2. To create retention/disposal schedules for YMCA Ireland records.
3. To support both protection of privacy and access to information as required under law.

PRINCIPLES OF BEST PRACTICE IN DATA PROTECTION

Anyone processing personal data must comply with the eight enforceable principles of good practice. These state that data information must:

1. Be obtained and processed **fairly and lawfully** (that the subject of the data has consented to its collection and use.)

YMCA Ireland will obtain and process personal data fairly and by the fulfillment of its functions.

2. Be held only for **specified** purposes

YMCA Ireland will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes

3. Be adequate, **relevant** but not excessive

Personal data held by YMCA Ireland will be adequate, relevant and not excessive about the purpose/s for which it is kept.

4. Be **accurate** and kept up to date.

YMCA Ireland will have procedures that are adequate to ensure high levels of data accuracy. YMCA Ireland will examine the general requirement to keep personal data up-to-date. YMCA Ireland will put in place appropriate procedures to assist staff in keeping data up-to-date.

5. Be held for no longer than **necessary**

YMCA Ireland has protocols on retention periods for data.

6. Be **accessible** to data subjects.

YMCA Ireland will have procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation

7. Be subject to the appropriate **security** measures.

YMCA Ireland will take appropriate security measures against unauthorized access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. YMCA Ireland is aware that high standards of security are essential for all personal information.

8. Not be **transferred** to other countries without adequate protection

MANAGEMENT & OWNERSHIP OF DATA

All records created and received by YMCA Ireland staff in the course of their duties must be retained for as long as they are required to meet the legal, administrative, financial and operational requirements of YMCA Ireland.

After such time they are either destroyed or transferred to YMCA Ireland archives. The final disposition (either destruction or transfer to archives) of records is carried out according to approved schedules as outlined in the Retention of Records Schedule.

All records, irrespective of format created or received by YMCA Ireland staff in the course of their duties are the property of YMCA Ireland and subject to its overall control. Employees leaving YMCA Ireland or changing positions within the organisation must leave all records intact for their successors

RESPONSIBILITIES

While YMCA Ireland is the “data controller” and has overall legal responsibility for the implementation of data protection procedures, the National Executive has delegated certain functions to staff.

Senior staff perform the duties associated with “data processors” and are responsible for ensuring data that is collected is processed by this and related policies.

It is the responsibility of every member of staff to be aware of the requirements of the Data Protection Acts when they collect or handle data about an individual.

It is the responsibility of all staff to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information including implementing the procedures below. When scheduled for destruction (as outlined in the Retention of Records Schedule) this material must be shredded or deleted from electronic drives to ensure that such information is not disclosed.

Staff must not disclose personal data except where there is subject consent or legal requirement. Data sent to outside agencies must always be protected by a Data Processing Agreement.

Staff need to ensure that all computers and mobile devices, USB sticks, external hard drives, etc used

for YMCA Ireland work purposes are passworded and any cloud-based device used for work purposes has 2-step verification enabled to ensure additional security. Encryption software is provided for mobile computers.

All staff and volunteers are covered by a confidentiality agreement which is included in the staff/volunteer handbook.

As part of its compliance with good data processing procedures, YMCA Ireland will ensure that the following actions are implemented each year

- Departmental Data Processing Logs are reviewed and updated

- Departments will nominate a Data Deletion Day where all personal records are reviewed and deleted in line with Data Day Procedures.

“Data subjects” have the right to access personal information that YMCA Ireland holds on them and the organisation will seek to respond to these requests within 1 month. Where a staff person receives such a request this must be signed off by a senior manager.

Where there is a breach of personal data through the loss of devices, access to documents and information etc, volunteers and staff must inform their line manager **immediately**. Where appropriate, YMCA Ireland will report breaches within 72 hours to the National Secretary.

YMCA Ireland will ensure that it has a privacy policy in place for users of its services and that this is available via its website.

YMCA Ireland will develop and implement a Privacy Policy for Staff which will be included in the Staff Handbook and made available for all staff.

YMCA Ireland will appoint a Data Protection Officer to ensure that it remains up-to-date and compliant with its legal responsibilities.

Where YMCA Ireland processes payroll on behalf of local YMCA a data processing agreement will be in place.

OTHER ASSOCIATED POLICIES

Disposal of Assets

ADOPTION AND REVIEW OF POLICY

The National Executive Committee adopted this policy on:
Date: June 2018 National Executive Meeting