



Family Resource Centres National Forum

Data Protection Policy

Document:	Data Protection Policy
What is this?	This is the Family Resource Centres National Forum (FRCNF) current Data Protection Policy
CRA Code Sections:	3.4, 3.7
Use of Document:	Trustees of the FRCNF CRA Compliance
Date Evaluation Form Approved:	This Policy was approved by the Voluntary Board of Trustees of FRCNF at its meeting on the 12 th of January 2023
Review Date:	This Policy will be reviewed every 3 years by the Voluntary Board of Trustees of FRCNF



Introduction

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data. The purpose of this policy is to provide a clear statement of the Family Resource Centres National Forum commitment to protect the rights and privacy of individuals in accordance with the General Data Protection Regulation (the GDPR) and the Data Protection Acts 1988 - 2018 (the DPA).

The FRCNF collects and processes the personal data (including special categories of data) of employee's/ board members/ training participants/volunteers/third party contractors/suppliers of goods and services. We regard the lawful and correct treatment of personal data as very important and we will ensure that we treat personal data lawfully and correctly.

This policy sets out about what personal data we collect and why we process it and how we protect and ensure that our employees, joint controllers and third-party data processors understand the rules governing their use of the personal data to which they have access during the course of their work on our behalf. It also covers the data protection principles we are committed to, a data subjects rights and our response to any data breach and other rights under the GDPR and the DPA.

What Personal Data We Collect

The FRCNF collect personal data relating to employee's/ board members/ training participants/volunteers/third party contractors/suppliers of goods and services which can include: name, home address, home telephone number, private email address, job title, date of birth, passport data, PPS number, bank details, emergency contact, staff number etc.

FRCNF also collects special category data relating to staff /board members which can include ethnic origin, health records and trade union membership.

Why We Process Personal Data

FRCNF process personal data for the following purposes:

- To carry out research and statistical analysis.
- To register an interest in and communicate about our services, training and volunteering opportunities.
- To respond to queries and/or information requests.
- To process job or volunteer applications.
- To process staff payroll.
- To respond to Subject Access Request(s).
- To respond to feedback or complaint(s).
- To comply with governance and statutory obligations.
- To select, contract and reimburse suppliers of goods and services.



Data Protection Principles

Under GDPR & DPA all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) Processing will be fair, lawful and transparent.
- b) Data be collected for specific, explicit, and legitimate purposes.
- c) Data collected will be adequate, relevant and limited to what is necessary for the purposes of processing.
- d) Data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay.
- e) Data is not kept for longer than is necessary for its given purpose.
- f) Data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures.
- g) We will comply with the relevant GDPR & DPA procedures for international transferring of personal data.

Lawful Basis of Processing

FRCNF will process personal data based on the following grounds:

Consent.

Where it is FRCNF legitimate interests to:

- Provide information about events/training/workshops that an individual has signed up for.
- Recruit employee's and volunteers and assess and process their application.
- To meet all legal and regulatory requirements on becoming and being a Board member.
- Manage our relationships with Funders.
- Follow up on individual queries.

Data Disclosures

FRCNF will not sell, trade or swap personal data with third parties.

We share personal data with third parties in the process of managing an individual's engagement with us such as partners who manage our events/training/ workshops they have signed up for.



We will disclose your personal data if we are required to disclose it in order to comply with any applicable law, regulation, court order, summons, search warrant or other statutory, regulatory or legal requirement.

We use external service providers to collect and process personal data on our behalf. Some of these service providers are located outside of the European Economic Area (EEA.) Where required FRCNF puts in place a contract with external service providers that sets out our requirements and their security measures and systems in place to keep your data safe in compliance with data protection legislation. By submitting your personal information to us you agree to the transfer, storing or processing at a location outside the EEA.

Data Retention

FRCNF will keep personal data only for as long as required by us:

- To provide a service.
- To comply with our statutory, legal, regulatory and contractual obligations.
- To support a claim or defence in court.

Data Safety

FRCNF holds personal data on a secure computer. We take all reasonable security, technical and organisational measures to ensure that the personal data we hold on you is protected from loss, misuse, alteration or destruction and to prevent any unauthorized or unlawful disclosure or processing.

Rights of the Data Subject

We are committed to assisting individuals with the implementation of the following data subject rights:

- The right to access the personal data we hold about them.
- The right to object to the processing of their personal data.
- The right to data portability.
- The right to complain about processing of their data carried out by us.
- The right to object to automated decision making.
- The right for their personal data to be updated; and
- The right to be forgotten.

If you wish to exercise any of your rights listed above or update you contact details held by us please contact:

The CEO
Family Resource Centres National Forum
Ballinfoile, Castlegar Neighbourhood Centre
Headford Road, Galway, H91 PN50
Email ceo@familyresource.ie



Responsibilities

In order to protect the personal data of individuals those within FRCNF who must process data as part of their role have been made aware of our policy on data protection.

Third Party Processing

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the FRCNF commitment to protecting data.

Requirement to Notify Personal Data Breaches

What is a personal data breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Reporting a breach.

In line with our *Personal Data Breach Policy & Procedures* FRCNF as a data controller will notify the Data Protection Commission of a personal data breach without delay where that breach is a likely to result in a risk to the rights and freedoms of the data subject. In addition, we will inform the individual whose data was subject of a breach without delay.

More information on how we deal with a data breach is available in our *Personal Data Breach Policy & Procedures*.

Training

FRCNF will provide access to data protection training to all employees, specific to their role. Employees are responsible to ensure they avail of training and information provided and to identify gaps that they feel they need addressed to ensure compliance with this policy.

Review and update

This policy will be reviewed every 3 years or sooner if required by a change in our business practice or legislation.