

Roscommon County Childcare Committee CLG

General Data Protection Regulation (GDPR) Pack



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Introduction

Roscommon County Childcare Committee CLG (Roscommon CCC), strives to comply with applicable laws and regulations related to Data Protection in Ireland. While conducting its day to day business, needs arise to gather and use certain information about individuals. These individuals can include parents, childcare staff, committee members, clients, suppliers, business contacts, employees and other people that Roscommon CCC have a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet data protection standards and to comply with General Data Protection Regulation (GDPR).

This policy aims to ensure that Roscommon County Childcare Committee CLG:

- Complies with Data Protection laws and follows good practice,
- Protects the rights of staff, clients and partners,
- Is open about how it stores and processes individuals' data,
- Protects itself from the risks of a data breach.

Policy Scope

This policy applies to:

- All staff & Committee members of Roscommon CCC,
- All volunteers and students on work experience,
- All contractors, suppliers and other people working on behalf of Roscommon CCC,
- All clients and or Data subjects Roscommon CCC obtain data on.

It applies to all data that the company holds and has access to relating to identifiable individuals and can include:

- Names of individuals
- Postal addresses/Eircodes
- Email addresses
- Telephone numbers
- Dates of birth
- PPSN Numbers
- Bank details
- Financial information including social welfare payments as part of CCSP eligibility
- Medical information
- Any other information relating to individuals.

Data protection risks

This policy helps to protect Roscommon CCC from data security risks including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how their personal data is used.
- Reputational damage. In case of a data breach, data used for fraud or if hackers gained access to sensitive data.

Responsibilities

Everyone working for or with Roscommon County Childcare Committee CLG has a responsibility to ensure that data is collected, stored and handled appropriately. Each staff member must ensure that they handle and process data in line with this policy and Data Protection principles (see Appendix 5).

General Staff Guidelines

- Roscommon CCC strives to collect the least amount of personal data possible. Only data needed for Roscommon CCC work should be accessed.
- If personal data is collected from a third party, Roscommon CCC must ensure that the personal data is collected lawfully and consent is obtained.
- Data should not be shared informally and should not be disclosed to unauthorised people.
- Management will support staff to understand their responsibilities in regards to the implementation of this policy.
- All data should be kept secure by taking sensible precautions.
- Strong passwords are in use, passwords should never be shared, and desktop computers should not be set to remember passwords.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required it should be deleted and disposed of.
- Staff should request help from the manager or Data Protection Officer if they are unsure about any aspect of data protection.

The board of directors is ultimately responsible for ensuring that Roscommon County Childcare Committee meets its legal obligations.

Data Protection Officer

The responsibility for ensuring appropriate personal data processing lies with everyone who works for or with Roscommon CCC and has access to personal data processed by Roscommon CCC. The key areas of responsibilities in relation to personal data lie with the Data Protection Officer (DPO).

The Data Protection Officer is responsible for:

- Informing and advising colleagues and the Committee of their Data Protection obligations and keeping them aware about data protection responsibilities, risks and issues.
- Monitoring the organisation's GDPR compliance and reviewing all Data Protection procedures and related policies in line with an agreed schedule.
- Handling Data Protection questions from staff and anyone else covered by this policy.
- Working with other staff as necessary to ensure initiatives abide by Data Protection principles and approving any Data Protection statements attached to communications such as emails and letters.
- Dealing with requests from individuals to see the data Roscommon CCC holds about them (also called "subject access requests").
- Provide advice regarding privacy impact assessments.
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data and evaluating third party services used to store or process data (e.g. cloud computing services).
- Addressing any Data Protection queries from outside of the organisation.
- Acting as a point of contact and co-operate with the data protection authority as required.

Responsibilities of IT services contracted by Roscommon CCC

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Providing Roscommon CCC with verification statements and information in regards to the computer systems provided.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.

Data Collection

Roscommon CCC ensures that data is collected lawfully, fairly and transparent by considering that consent is freely given, that there are opportunities offered to withdraw consent and to correct data held.

Roscommon CCC will carry out a data inventory on a regular basis to establish that all data is held in accordance with GDPR.

Any collection of personal data will be completed with the data subject directly so that consent can be given prior to the collection of the data. Data will not be shared informally and will not be disclosed to unauthorised

people. Management and the DPO will support staff to understand their responsibilities in regards to the implementation of this policy. All data will be kept secure by taking sensible precautions.

Data Storage

Data stored **on paper** should be kept in a secure place where unauthorised people cannot see it. This also applies to data usually stored electronically that has been printed:

- When not required the paper or files should be kept in a locked drawer or filing cabinet.
- Staff must ensure that paper or printouts are not left where unauthorised people could see them, e.g. on the printer.
- Data printouts should be shredded and disposed of securely when no longer required.

Data **stored electronically** must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared.
- Desktop computers should not be set to remember passwords.
- It is our policy that service's data will not be stored on removable media such as CD, DVD and USB.
- Data should only be stored on or uploaded to designated drives and servers.
- Servers containing personal data should be sited in a secure location away from public office space.
- Data should be backed up frequently, backups should be tested regularly in line with backup procedures.
- Data should never be saved directly to laptops or mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

Physical Security of the premises:

- Alarm system on the premises.
- Offices locked.
- Locked filing cabinets.
- Online data management systems are password protected.
- Computers/laptops are password protected and encrypted.
- Files are stored in appropriate places.
- Shredder used to dispose of documents and printed data.

Access Control, data Security:

- Roscommon CCC are particularly aware that as part of our work we have access to children's data.
- Accessing computers, accessing portals, access needs of internal staff will be monitored.

Data use

It is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data staff should ensure that computers screens are always locked when left unattended.
- Personal data should not be shared informally.
- Precautions need to be put in place before transferring data electronically (i.e. encryption and using PDF)
- Staff should not save copies of personal data to their own computers or devices, always access the central copy of any data instead on the Roscommon CCC shared drive.
- Personal data should never be transferred outside of the European Economic Area.

Data accuracy

Roscommon CCC maintains the accuracy, integrity, confidentiality and relevance of personal data based on the processing purpose. Roscommon CCC will take reasonable and proportionate steps to ensure data is kept accurate and up to date. This responsibility is shared by all staff.

- Data will be held in as few places as necessary, staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated (i.e. as soon as they become aware of a change or an inaccuracy, checking details with clients routinely).
- Roscommon CCC aims to make it easy for data subjects to update the information we hold about them, this is facilitated by regular reviews and ongoing updates as requested by email or letter.

Data Access requests

All individuals who are the subject of personal data held by Roscommon CCC are entitled to ask what information is held about them and why, find out how to gain access to it, be informed how to keep it up to date and have information on how Roscommon CCC is meeting its Data Protection obligations. Roscommon CCC is responsible to provide a data subject with a reasonable access mechanism to enable them to access their personal data and must allow them to update, rectify, erase or transmit their personal data if appropriate or required by law.

Any such request will be dealt with in line with GDPR aiming for a response time of 30 calendar days. (See appendix 3C)

Disclosing data for other reasons

In certain circumstances (i.e. Child Protection and Welfare) the Data Protection Act allows personal data to be disclosed to relevant agencies in an appropriate manner without the consent of the data subject.

Data Retention and Erasure

The DPO defines the time period for which documents and electronic records should be retained in line with the Data Retention Schedule below. These retention periods are predominately determined by statutory obligations. Roscommon CCC aim to keep data for the least amount of time that is necessary in accordance with other requirements we are obliged to adhere to. As an exemption, retention periods with the data schedule will be prolonged in such cases as ongoing investigations from Irish authorities, if there is a chance records of personal data are needed by Roscommon CCC to prove compliance with any legal requirements or when exercising legal rights during legal cases or similar court proceedings recognised under Irish law. Appropriate controls are in place to prevent the permanent loss of essential information as a result of malicious or unintentional destruction of information. These controls include restricting access to the filing cabinet to only those who are permitted to access the data and also include password protected access to the IT equipment that stores the data. Please see below:

Data Set	Description	Documentation	Retention Period	Final Action: Archive or Dispose
Agreements & Contracts	<i>Pobal Grant Agreements to Roscommon County Childcare Committee</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator filing cabinet. • Soft copies on Roscommon CCC Shared Drive • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Agreements & Contracts	<i>Agreements with Trainers</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose

Grants	Parent & Toddler grants <i>Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared Drive. • Emails saved on shared drive on encrypted laptop. 	7 Years after the delivery period	Dispose
Grants	Childminding Development Grants <i>Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared drive. • Emails shared on shared drive and on encrypted laptop. 	7 Years after the delivery period	Dispose
Grants	Small Scale Capital Grants <i>Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator /CDO filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Grants	Large scale capital grants <i>Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Grants	Learner Fund Bursary <i>Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails</i>	<ul style="list-style-type: none"> • Hard copies in Administrators /CDO locked filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Grandfathering declarations	<i>Grandfathering declaration forms</i>	<ul style="list-style-type: none"> • Hard copies in locked Administrators/CDO filing cabinet. • Emails on encrypted laptop. • Soft copies saved on Roscommon CCC shared drive. 	7 Years after the delivery period	Archive
Reports	Annual Local Implementation Plans (LIP)	<ul style="list-style-type: none"> • Hard copies in Managers locked Office. • Soft copies on Roscommon CCC Shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose

	<i>Individual staff reports</i>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>Project work reports</i>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>Roscommon CCC strategy documents</i>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>Mid-Year reports</i>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared Drive. • Hard copies in Managers locked office. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>End of Year Reports</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>Pobal Audit Reports</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	<i>National Siolta Aistear Initiative</i>	<ul style="list-style-type: none"> • Hard copies in Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Contact details	<i>Roscommon CCC members</i>	<ul style="list-style-type: none"> • Hard copies in Managers filing cabinet and Administrators filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. • Data Base – Password encrypted. 	Keep indefinitely	Minimise data and archive
	<i>Roscommon CCC working group members/Sub Committees</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office and Administrators filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	Keep indefinitely	Minimise data and archive
	<i>Roscommon CCC Staff</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Manager hard drive. • Email on encrypted laptop. 	Keep indefinitely	Minimise data and archive
	<i>Registered Early Years Services in Roscommon.</i>	<ul style="list-style-type: none"> • Hard copies in Administrators/CDO filing cabinets. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. • Database password encrypted. 	Keep indefinitely	Minimise data and archive

	Early years staff members employed in Co Roscommon.	<ul style="list-style-type: none"> • Hard copies in Administration filing cabinet. CDO • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. • Soft copy lists on Roscommon CCC shared drive. • Database password encrypted. 	Keep indefinitely	Minimise data and archive
	School Age Childcare Services in Co Roscommon with a DCYA reference number	<ul style="list-style-type: none"> • Hard copies in Administrators /CDO locked filing cabinets. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. • Soft copy lists on web site. • Database password encrypted. 	Keep indefinitely	Minimise data and archive
	Voluntary Notified Childminders in Co Roscommon	<ul style="list-style-type: none"> • Hard copies in Administrators/CDO locked filing cabinet. • Soft copies on Roscommon CCC shared Drive. • Email on encrypted laptop. • Soft copy lists on web site. • Data base password encrypted. 	Keep indefinitely	Minimise data and archive
	Parent & Toddler Groups in Co Roscommon.	<ul style="list-style-type: none"> • Hard copies in Administrators/CDO locked filing cabinet. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. • Soft copy lists on web site. • Data base password encrypted. 	Keep indefinitely	Minimise data and archive
Meetings	Co Roscommon CCC & it's working groups <i>Minutes of meetings</i> <i>Agendas</i> <i>Supporting documents</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared drive. • Email Soft copies on Roscommon CCC shared drive. 	7 Years after the delivery period	Dispose
	Childcare Committees Ireland & it's working group <i>Minutes of meetings</i> <i>Agendas</i> <i>Supporting documents</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC hard drive • Email encrypted laptop. 	7 Years after the delivery period	Dispose
	Co Roscommon CCC team meetings <i>Minutes of meetings</i> <i>Agendas</i> <i>Supporting documents</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared drive. • Email encrypted laptop. 	7 Years after the delivery period	Dispose
	Pobal Performance Dialogue meetings <i>Minutes of meetings</i> <i>Agendas</i> <i>Supporting documents</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
	DCYA <i>Minutes of meetings</i>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. 	7 Years after the delivery period	Dispose

	<p><i>Agendas</i> <i>Supporting documents</i></p>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared drive. • Email on encrypted laptop 		
	<p><i>CYPSC & it's working groups meetings</i> <i>Minutes of meetings</i> <i>Agendas</i> <i>Supporting documents</i></p>	<ul style="list-style-type: none"> • Hard copies in Managers locked office. • Soft copies on Roscommon CCC shared drive • Email on encrypted laptop. 	7 Years after the delivery period	Dispose
Action Files	<p><i>Extract from LIP showing summary of Action, target group, budget allocation</i> <i>Extract from Co Roscommon CCC minutes stating that the LIP (and action) were approved</i> <i>Evidence that Public Procurement guidelines were complied with.</i> <i>Documented progress & final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</i></p>	<ul style="list-style-type: none"> • Hard copies in Administrator/CDO filing cabinet. • Soft copies on Roscommon CCC shared drive • Emails on encrypted laptop. 	7 Years after the delivery period	Dispose
	<p><i>National Síolta Aistear Initiative</i> <i>Extract from LIP showing summary of Action, target group, budget allocation</i> <i>Extract from Co Roscommon CCC minutes stating that the LIP (and action) were approved</i> <i>Evidence that Public Procurement guidelines were complied with.</i> <i>Documented progress & final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</i></p>	<ul style="list-style-type: none"> • Hard copies in Administrators/CDO locked filing cabinet. • Soft copies on Roscommon CCC shared drive • Emails on encrypted laptop. 	7 Years after the delivery period	Dispose
	<p><i>Access Inclusion Model</i> <i>Extract from LIP showing summary of Action, target group, budget allocation</i> <i>Extract from Co Roscommon CCC minutes stating that the LIP (and action) were approved</i> <i>Evidence that Public Procurement guidelines were complied with.</i> <i>Documented progress & final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</i></p>	<ul style="list-style-type: none"> • Hard copies in Administrators /CDO locked filing cabinet. • Soft copies on Roscommon CCC shared drive • Emails on encrypted laptop. 	7 Years after the delivery period	Dispose
	<p><i>Child Protection Training</i></p>	<ul style="list-style-type: none"> • Hard copies in Administrators / CDO locked filing cabinet. 	7 Years after the delivery period	Dispose

	<i>Extract from LIP showing summary of Action, target group, budget allocation Extract from Co Roscommon CCC minutes stating that the LIP (and action) were approved Evidence that Public Procurement guidelines were complied with. Documented progress & final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</i>	<ul style="list-style-type: none"> • Soft copies on Roscommon CCC shared drive • Emails on encrypted laptop. 		
Financial Records	Invoices	<ul style="list-style-type: none"> • Administrator's / CDO locked filing cabinet. • Soft Copy on Roscommon CCC shared drive. 	7 Years after the delivery period	Dispose
	Fixed Assets Register	<ul style="list-style-type: none"> • Administrator's / CDO locked filing cabinet. • Soft Copy on Roscommon CCC shared drive. 	7 Years after the delivery period	Dispose
Early Years Services documentation	Records on individual early years' service in Co Roscommon <i>Files of records on meetings with early years services Observations of these service's practise. Details of the service, committee details etc (e.g. their DCYA registration number)</i>	<ul style="list-style-type: none"> • Hard copies in Administrators/CDO locked filing cabinets. • Soft Copy on Roscommon CCC shared drive • Email on encrypted laptops • Soft copies on encrypted database. 	7 Years after the delivery period	Dispose
ROSCOMMON CCC internal database	<i>Parents</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Pobal</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Better Start</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>DCYA</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>ROSCOMMON CCC Board</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Roscommon County Council</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>CYPSC</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Tusla</i>	<ul style="list-style-type: none"> • Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive

	<i>GRETB</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Local Collaborators/ Interagency</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Childminders</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Parent & Toddler Groups</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>General Enquirer</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Potential Provider</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive
	<i>Roscommon Integrated Development Company</i>	<ul style="list-style-type: none"> Soft copy lists on Roscommon CCC password encrypted database. 	Review yearly	Minimise data and archive

Procedures for data to be deleted, erased, wiped etc. will be reviewed annually by staff and reported to Roscommon CCC to ensure this is done at the correct time. The specific deletion or destruction process may be carried out either by an employee or by an internal or external service provider that the DPO subcontracts for this purpose. Destruction of data is always approved by the DPO and the details recorded. Any applicable general provisions under relevant Data Protection laws and Roscommon CCC's Data Protection policy shall be complied with.

Data Breach Reporting:

Breaches must be reported to the relevant supervisory authority within 72 hours of discovering the breach, unless the breach is unlikely to result in a risk to the rights of data subjects. Data subjects will be notified if the breach results in "high risk" to them. Records of all breaches will be kept by data controllers and processors. (See appendix 4)

Providing Information:

Roscommon CCC aims to ensure that individuals are aware that their data is being processed and that they understand how the data is being used and how to exercise their rights. This is communicated through Roscommon CCC's Privacy Statement and Roscommon CCC's Data Protection Policy.

Privacy Impact Assessments

Roscommon CCC must decide whether to perform a Data Protection Impact assessment (see below) for each data processing activity according to the above data retention policy. Data Processing – Data mapping: Maps the flow of data through the organisation. Each Roscommon CCC staff member will process data relevant to their Job role using various systems:

Staff name	Purpose	Type of data	Level of risk	Systems used	Retention and deletion	
All staff	Supporting Childcare Services and DCYA with the implementation and	Personal data	High risk	PIP (user level and CRM)	7 years Shredded	Dispose

	delivery of national childcare programmes and compliance with contractual obligations					
All staff	Supporting DCYA in the delivery of Capital Grants, Learner Fund, CMDG, P&T Grants	Word and Excel documents Organisational data Contact details	Medium	Microsoft Word & Excel Data Base	7 years Shredded	Dispose
All staff	Organising and delivery of Training for childcare staff	Excel & Word documents	Medium	Data base	7 years	Dispose
All staff	Support to parents in relation to childcare (accessing services, queries on DCYA programmes,	No names held Telephone numbers deleted after query is dealt with	Low	Recorded on database “as a parent”	7 years	Dispose
All staff	Support to services to meet new regulations and implementing National Practice Frameworks and TUSLAs Quality and Regulatory Framework	Hard copy held on file Soft copy on computer	Low	Recorded on database “as a service interaction” Copy of report sent to Manager. Destroyed after reading. Hard copy kept on file	7 years	Dispose
Manager and development officer.	Support to services with HR issues		Hard copy held on file Soft copy on computer	Recorded on data base “as a service interaction” Copy of report sent to Manager. Destroyed after reading. Hard copy kept on file	7 years	Dispose
Manager and development officer.	Support to management committees and crisis management supports		Hard copy held on file Soft copy on computer	Recorded on sendmode “as a service interaction” Copy of report sent to Manager. Destroyed after reading. Hard copy kept on file	7 years	Dispose
CDO Team	Supporting the delivery of AIM	Names, email addresses & telephone numbers of attendees	Hard copy held on file Soft copy on computer	Recorded on data base. Hard copy in Action files	7 years	Dispose

Manager	Implementing Children First National Training Programme and support to services in relation to this	Names, email address, telephone numbers of attendees	Hard copy held on file Soft copy on computer	Recorded on data base. Hard copy in Action files	7 years	Dispose
CDO team & Manager	Supporting and Promoting Parents Training	Names & telephone numbers of attendees		Excel sheet of names and phone numbers of parents	7 years	Dispose

Data Protection statement

Roscommon County Childcare Committee CLG will collect, retain and process your personal data (including your sensitive personal data) about you on computer and in manual files/paper files. This data will only be used to efficiently manage the business of Roscommon CCC; so that we can monitor our compliance with the law and best practice; for staff administration purposes and for other legitimate purposes consequent to your employment with Roscommon CCC. For these purposes, it may be from time to time necessary to disclose relevant personal data to third parties, including (but not limited to) payroll processors, pension brokers/trustees, or insurers. It may also be necessary to process data in order to comply with any legal or regulatory obligations. Roscommon CCC will process all personal data in accordance with the Data Protection Acts 1998 and 2003, and the General Data Protection Regulation. Should your personal circumstances change, you should notify Roscommon CCC immediately of any changes in your personal data.

This policy is intended to comply with the laws and regulations in Ireland in which Roscommon CCC operates. In the event of any conflict between this policy and applicable laws and regulations, the latter shall prevail.

Validity and document management

This document is valid from November 2019.

The owner of this document is Roscommon County Childcare Committee CLG, who must check and, if necessary, update the document at least once a year.

Appendix

- (1) (A) Privacy statement**
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 - (3) (Ci) Acknowledgement of data subject access request**
 - (3) (D) Identification letter in response to data subject access request**
 - (3) (E) Response to a data subject access request**
- (4) Data Breach**
 - (4) (A) Data breach notification form**
 - (4) (B) National breach notification form**
 - (4) (C) Roscommon CCC Data breach registration**
- (5) Data Protection principles**
- (6) Definitions**

Appendix 1(A)

Roscommon County Childcare Committee CLG

PRIVACY NOTICE

1. Opening Statement

Roscommon County Childcare Committee CLG (Roscommon CCC) has created this privacy statement in order to demonstrate our firm commitment to your privacy. We respect your privacy and your rights to control your personal data. We will be clear about what data we collect and why we collect it. This privacy statement explains the personal information we collect from you, why we collect it, how we will use it and how we protect it.

Roscommon CCC collects personal data about you in order to deliver local programmes and actions on behalf of the Department of Children and Youth Affairs (DCYA). By agreeing to this statement and Data Protection policy, Roscommon CCC will hold your personal data as described in this Statement.

Roscommon CCC is a Controller of the personal data you (the data subject) provide us with. We may collect the following types of personal data from you, about you depending on programme requirements:

- Personal Data: date of birth, your address, email address, telephone number, PPS number, social welfare status, bank account details, DCYA reference number, Túsla reference number, and any other relevant data required.

2. Why We Collect Your Personal Data?

We use the personal data you share with us so we can communicate with you and disseminate information on behalf of the DCYA and Pobal and other relevant agencies and stakeholders.

3. Sharing & Disclosure

Roscommon CCC strive to keep your personal data safe and only share it when necessary. Roscommon CCC will collect, retain and process your personal data (including your sensitive personal data) about you on computer and in some instances manual files/paper files. This data will only be used to efficiently manage the business of Roscommon CCC; so that we can monitor our compliance with the law and best practice; for staff administration purposes and for other legitimate purposes. It may also be necessary to process data in order to comply with any legal or regulatory obligations. Roscommon CCC will process all personal data in accordance the Data Protection Acts 1998 and 2003, and the General Data Protection Regulation. Should your personal circumstances change, you should notify Roscommon CCC immediately of any changes in your personal data. We recognise that you have a right to know that the information you share with Roscommon CCC is maintained confidentially. We only disclose your information as authorised in this statement. We do not rent or sell your Personal information to anyone. We may share your personal information with the third parties listed below.

Who We May Share Your Personal Information With:

- Department of Children & Youth Affairs (DCYA)
- Pobal PIP System & Pobal Compliance Officers
- Department of Education
- An Garda Síochána
- Tusla Early Years Inspectorate
- Health & Safety Authority
- National Employment Rights Authority
- The Revenue Commissioners
- Tusla - Child and Family Agency
- Roscommon County Childcare Committee CLG's auditor and/or legal advisor.

Protection of Roscommon CCC & others and Disclosures for Law Enforcement

Under certain circumstances Roscommon CCC may be required to disclose your Personal Information in response to valid requests by public authorities to meet law enforcement requirements.

4. What we do with your data?

Your personal data is stored and processed in Roscommon CCC located at Knock Road, Castlerea, Co. Roscommon. Your personal data is held on Roscommon CCC database on an encrypted computer system and or hard copies stores in our locked cabinets. Please see Roscommon CCC's Data protection policy to see what details are held and retained for how long.

5. How long we keep your personal data?

Your records will be kept in line with our Data Retention table within our Data Protection policy.

6. What are your rights?

We use appropriate technical, organisational and administrative security measures to protect all personal data we hold in our records and keep them secure. Unfortunately, no organisation can guarantee complete security.

Right of Access

Individuals have the right to access their personal data and supplementary information. Please use the Subject Access Request Form attached and contact the Data Protection Officer (DPO) / Deputy DPO at: info@roscommonchildcare.ie entitling Data Protection in the subject bar or in writing to Roscommon County Childcare Committee CLG, Knock Road, Castlerea, Co. Roscommon. We will acknowledge your request and respond to you within 30 calendar days.

Right to Rectification

Please advise Roscommon CCC of any changes in your or your service's personal information, as soon as possible. Should you believe that any personal data we hold on you is incomplete or incorrect, you have the ability to request to see this information and have it rectified.

Right to Erasure

In certain circumstances, data subjects have the right to erasure of their data. Please contact the DPO/Deputy DPO at info@roscommonchildcare.ie or in writing at Roscommon County Childcare Committee CLG, Knock Road, Castlerea, Co. Roscommon. We will acknowledge your request and respond to you within 30 calendar days. This is not an absolute right and only applies in certain circumstances.

Right to Restrict Processing

Individuals have the right to request the restriction or suppression of their personal data. Please contact the DPO/Deputy DPO at info@roscommonchildcare.ie or in writing at Roscommon County Childcare Committee CLG, Knock Road, Castlerea, Co. Roscommon. We will acknowledge your request and respond to you within 30 calendar days. This is not an absolute right and only applies in certain circumstances.

Right to Object

You have the right to object and be removed from any direct marketing emails.

Right to be informed

This privacy policy explains what information we need to collect and how we use it.

Right to Portability

Data subjects can ask that their personal data be transferred to them or a third party in machine readable format (Word, PDF, etc.). However, such requests can only be fulfilled if the data in question is: 1) provided by the data subject to Roscommon CCC, 2) is processed automatically and 3) is processed based on consent or fulfilment of a contract.

In the event, that you wish to complain about how we have handled your personal data, please contact the DPO /Deputy DPO of RCCC at info@roscommonchildcare.ie or in writing at Roscommon County Childcare Committee CLG, Knock Road, Castlerea, Co. Roscommon. The DPO will then investigate your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact Irish Data Protection Authority and file a complaint with them.

Validity and document management

This document is valid from 10th Date.

The owner of this document is Roscommon CCC CLG, who must check and, if necessary, update the document at least once a year.

Appendix 1 (B)

PRIVACY STATEMENT (WEBSITE)

Website of Roscommon County Childcare Committee

Roscommon County Childcare Committee (Roscommon CCC) has created this privacy statement in order to demonstrate our firm commitment to your privacy. By visiting www.roscommonchildcare.ie you are accepting the practices described in this Privacy Notice.

This statement relates to our privacy practices in connection with Roscommon CCC website. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such.

Roscommon CCC may occasionally change this statement, so please review it from time to time. Roscommon CCC last amended this statement in Date.

General Statement

Roscommon CCC fully respects your right to privacy, and we will not collect any personal information about you on this website without your clear permission. Any information which you volunteer to Roscommon County Childcare Committee's website will be treated with the highest standard of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 & 2003 and Regulation (EU) 2016/679.

What personal information about customers does Roscommon CCC gather?

The information we learn from customers helps us personalise and continually improve your online experience at www.roscommonchildcare.ie. Here are the types of information we may gather:

Information you give us:

Roscommon CCC receive and store any information you enter on our website on our internal data base send mode (EG. If Roscommon CCC team reply to a comment that is left on a post). You can choose not to provide certain information, but then you may not be able to take advantage of some of our features. We use the information that you provide for such purposes as responding to your requests, customising our online services for you, improving our online services, and communicating with you.

Where a user voluntarily provides personal information, the data will be used for analysis, research or customer service purposes only. Any personal data provided by you to us will be held in accordance with the Data Protection principles set out in the Data Protection (Amendment) Act, 2003, the Data Protection Act, 1988, Electronic Commerce Act, 2000, and other relevant E.U. and Irish legislation.

Roscommon CCC uses mailing lists to pass on information to you, we will always have a clear mechanism for you to remove yourself from future mailings. (Subscription service via mail chimp).

Roscommon CCC assures you that the identity of all who contact us through this website is kept confidential: we do not rent, sell, or exchange mailing lists, or otherwise disclose such information to third parties, except as may be required by law, or through voluntary cooperation with law enforcement authorities if we judge that such cooperation is necessary to combat fraud or other crime.

Automatic Information:

For general web browsing no personal information is revealed to us, although certain statistical information is available to us from our website logs. For example, like many websites, we obtain certain types of information when your web browser (browsers are pieces of software that allow you to access the internet; examples include: Internet Explorer, Netscape, Opera, Mozilla, etc.) accesses www.roscommonchildcare.ie. See below for examples.

Examples of information collected:

- Internet Protocol (IP) address used to connect your computer to the internet (for example 192.168.88.21)
- Email address - if you email any of our public email addresses
- Computer and connection information such as browser type and version, operating system, platform, referring url and pages visited

Roscommon CCC will make no attempt to identify individual visitors or to associate the technical details listed above with any individual, except in cases where criminal activity has taken place (i.e. in response to a "hacking" incident). It is the policy of Roscommon CCC never to disclose such technical information in respect of individual website visitors to a third party (except for law-enforcement bodies and then only in response to illegal activity such as "hacking"; also our Internet Service Provider which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by a rule of law. The technical information will be used only by Roscommon CCC, and only for statistical and other administrative purposes. You should note that technical details, which we cannot associate with any identifiable individual, do not constitute "personal data" for the purposes of the Data Protection Acts, 1988 & 2003.

Cookies

Roscommon CCC website currently uses cookies. Cookies are small text files which are downloaded to your computer or mobile device when you visit a website or application. Your web browser (such as Internet Explorer, Mozilla Firefox or Google Chrome) then sends these cookies back to the website or application on each subsequent visit so that they can recognise you and remember things like user preferences. By continuing to use our website without changing the settings, you are agreeing to our use of cookies.

The "Help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. However, cookies allow you to take full advantage of some features, and we recommend that you leave them turned on.

www.roscommonchildcare.ie uses Analytics, a web analytics service provided by Google, Inc. ("Google"). Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using www.roscommonchildcare.ie, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Does www.roscommonchildcare.ie Share the information it receives?

Rarely. In cases where there is a statutory requirement to share information with a government agency or other local authority or where your information must be shared with another agency in order to answer a customer query, then the minimum amount of information required will be shared in an appropriate manner. Generally, information is shared with other agencies as an aggregate rather than as a specific piece of data. We may choose to release automatic information (see above) and other information received to the website to companies and organizations for fraud

protection and credit risk reduction. Information of this type will only be shared about users who have caused or attempted to cause damage to www.roscommonchildcare.ie. This type of information would be shared only as a result of "hacking" attacks, fraud or other illegal activities.

This document is valid from 17th Date.

The owner of this document is Roscommon CCC CLG, who must check and, if necessary, update the document at least once a year.

Appendix 1 C

PRIVACY STATEMENT FOR STAFF

Introduction

Roscommon County Childcare Committee CLG (Roscommon CCC) strives to comply with applicable laws and regulations related to Personal Data protection in Ireland. While conducting its business, Roscommon CCC needs to gather and use certain information about individuals. This can include parents, childcare staff and committee members, clients, suppliers, business contacts, employees and other people that the company may have a relationship with or need to contact.

This policy document outlines the principles by which Roscommon CCC handles personal data of parents, children, suppliers, employees and other individuals who are involved with the company. This policy indicates the responsibilities of its employees, contractors, volunteers and students while processing personal data.

Employees will consider the personal data held on their computers and on file. It applies to all data that the company holds and has access to relating to identifiable individuals and can include:

- Names of individuals
- Postal addresses/ Eircode
- Email addresses
- Telephone numbers
- Dates of Birth
- PPSN Numbers
- Bank details
- Financial information including social welfare payments as part of CCSP eligibility
- Medical information
- Plus any other information relating to individuals

This policy helps to Protect Roscommon CCC from some very real data security risks including:

- Breaches of confidentiality. For instance, information being given out inappropriately
- Failing to offer choice. For instance, all individuals should be free to choose how their personal data is used
- Reputational damage. In case of a data breach, data used for fraud or if hackers gained access to sensitive data

Roscommon County Childcare Committee will collect, retain and process your personal data (including your sensitive personal data) about you on computer and in manual files/paper files. This data will only be used to efficiently manage the business of Roscommon CCC; so that we can monitor our compliance with the law and best practice; for staff administration purposes. It may be necessary to process data in order to comply with any legal or regulatory obligations. Roscommon CCC will process all personal data in accordance the Data Protection Acts 1998 and 2003, and the General Data Protection Regulation 2016.

Who is this policy for?

All employees either permanent or temporary, all contractors, all volunteers, students, suppliers and other people working on behalf of Roscommon CCC are obliged to read and understand this document so they are fully aligned with

the policy of Roscommon CCC. This policy is available on request to outline how our service obtains, holds and processes personal data.

This policy aims to ensure that Roscommon County Childcare Committee CLG:

- Complies with data protection law and follow good practice
- Protects the rights of staff, clients and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Definitions

Roscommon CCC have listed below a number of key definitions of terms that are used in this document for your information. These definitions are specifically drawn from Article 4 of the European Union's General Data Protection Regulation:

Personal Data

Any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, mental, economic, cultural, or social identity of that natural person. (Regulation (EU) 2016/679, 2016).

Personal Data includes a natural person's email address, telephone number, biometric information (such as fingerprint), location data, IP address, health care information, religious beliefs, Social Security number, marital status etc.

Sensitive Personal Data

Particularly sensitive data includes data in relation to fundamental rights and freedoms, where disclosure of such data could lead to physical damage, financial loss, damage to the reputation, identity theft or fraud or discrimination etc. Sensitive personal data usually includes but not limited to personal data revealing racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership, as well as genetic data, biometric data (fingerprint) for the purpose of uniquely identifying a natural person, and data concerning a natural person's health or sexual orientation.

Processing

Processing means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination, restriction, erasure, or destruction of the data (Regulation (EU) 2016/679, 2016).

Data Controller

The natural or legal person, public authority, agency or any other body, which alone or jointly with others, determines the purpose and means of the Processing of Personal data. Where the purposes and means of such processing are determined by Union or Member state law, the controller or the specific criteria for its nomination may be provided for by Union or member state (Regulation (EU) 2016/679, 2016).

Data Processor

A natural or legal person, public authority, agency or any other body which processes personal data on behalf of a Data Controller (Regulation (EU) 2016/679, 2016).

Basic Principles

Roscommon CCC is considered a Data Controller. Therefore Roscommon CCC are responsible for the data that they obtain and have to demonstrate compliance with the data protection principles as listed below.

Everyone working for or with Roscommon CCC has a responsibility to ensure that data is collected, stored and handled appropriately. Each staff member must ensure that they handle and process data in line with this policy and data

protection principles. The principles listed below outline the basic responsibilities for Roscommon CCC when handling personal data.

Lawfulness, Fairness and Transparency

Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. (Regulation (EU) 2016/679, 2016).

There are three components to this principle; Lawfulness, Fairness and Transparency and they are all linked. The data subject will be told what processing will occur (Transparent), the actual processing will match this description (Fair), and finally the processing will match one of the six purposes specified in the GDPR (Lawful). Roscommon CCC relies on a GDPR fundamentals which are contractual and consent for processing data.

Purpose limitation

Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with article 89(1), not be considered to be incompatible with the initial purposes. Regulation (EU) 2016/679, 2016).

Roscommon CCC will define up front what personal information we collect, how it is going to be used, for what purpose and we will limit using that information for these purpose(s) only.

This process will be completed through our privacy notice, our terms and conditions and our consent forms. These documents can be found in Roscommon CCC staff handbook, our data protection policy and on our website.

Data minimisation

Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. Regulation (EU) 2016/679, 2016).

Roscommon CCC will only collect/hold enough data to carry out the process, Roscommon CCC will not collect/hold what you don't need. Please refer to Roscommon CCC Retention policy for information on how long data is kept.

Accuracy

The accuracy of the personal data is contested by the data subject, for a period enabling, the controller to verify the accuracy of the personal data. . Regulation (EU) 2016/679, 2016).

Any data that is being held needs to be accurate. Roscommon CCC strives to keep the personal information we hold up to date and accurate. Data Subjects, can request any information held on them, as this is their right, they can also request correction or completion of information relating them. (Please see Data Subject Access Request Procedure).

Storage period limitation

Personal data must be kept for no longer than is necessary for the purposes for which the personal data are processed. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Regulation (EU) 2016/679, 2016).

If the information is no longer required it should be securely disposed of. Please refer to the "Data Retention Policy" for information on why Roscommon CCC keep data and for how long. It is taken into account the legal and contractual requirements and retention periods for information.

Integrity and confidentiality

Processed in a manner that ensures appropriate security of personal data, including preventing unauthorised access to or use of personal data and the equipment used for the processing. Regulation (EU) 2016/679, 2016).

Every employee does not need access to the personal information that Roscommon CCC collects. Only those that require access should have it. The physical security of the filing cabinets and rooms are to be considered and access to any electronic devices that hold personal data will be restricted accordingly.

Accountability

The controller shall be responsible for, and be able to demonstrate compliance with (principles relating to processing of personal data). Regulation (EU) 2016/679, 2016).

Roscommon CCC is responsible for and must be able to demonstrate compliance with the principles outlined above.

If a third-party contractor, for example, a computer contractor, provides Roscommon CCC with services, Roscommon CCC have a contract of services with that third-party provider, and this contract will include processes that outline that any personal information processed by the third party is being done so in compliance with the six principals outlined above. This is very important as Roscommon CCC remain responsible for the personal data even if the third party are responsible for a data breach.

Building Data Protection into Roscommon CCC CLG

In order to demonstrate compliance with the principles of data protection, Roscommon CCC build and engrain data protection into its day to day activities.

Notification to Data Subjects (Privacy Notice)

See the Fair Processing Guidelines section below.

Data Subject's Choice (Consent)

See the Fair Processing Guidelines section below.

Collection of Data

Roscommon CCC ensures that data is collected lawfully, fairly and transparent by considering that consent is freely given, that there are opportunities offered to withdraw consent and to correct data held.

Staff of Roscommon CCC will carry out a data inventory on a regular basis to establish that all data is held in accordance with GDPR.

Roscommon CCC strives to collect the least amount of personal data possible. Only data needed for our work should be accessed. If personal data is collected from a third-party such as a neighbour or friend of the data subject, Roscommon CCC must ensure that the personal data is collected lawfully and consent is obtained.

- Any collection of personal data will be done from the data subject, the person, directly so consent can be given prior to the collection of data. Data will not be shared informally and will not be disclosed to unauthorised people. Management will support staff to understand their responsibilities in regards to the implementation of this policy. All data will be kept secure by taking sensible precautions. Strong passwords will be used, passwords are not be shared, and desktop computers should not be set to remember passwords. Data will be regularly reviewed and updated if it is found to be out of date. If data is no longer required it will be deleted and disposed of. Staff should request help from the data protection officer (DPO) if they are unsure about any aspect of data protection

The board of Roscommon CCC is ultimately responsible for ensuring that Roscommon County Childcare Committee meets its legal obligations.

Using the Data, Retaining the Data and Disposing of the Data

The purposes, methods, storage limitation and retention period of personal data must be consistent with the information contained in Roscommon CCC Privacy Notice.

Roscommon CCC maintains the accuracy, integrity, confidentiality and relevance of personal data based on the processing purpose. Adequate security mechanisms designed to protect personal data must be used to prevent personal data from being stolen, misused, or abused, and prevent personal data breaches.

The Board of Roscommon CCC is responsible for compliance with the requirements listed in this section.

It is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data staff should ensure that computers screens are always locked when left unattended
- Personal data should not be shared informally. It should never be sent by email, as this form of communication is not secure
- Precautions need to be put in place before transferring data electronically (i.e. encryption)
- Staff should not save copies of personal data to their own computers or devices, always access the central copy of any data instead
- Personal data should never be transferred outside of the European Economic Area
- Data stored on paper should be kept in a secure place where unauthorised people cannot see it. This also applies to data usually stored electronically that has been printed. When not required the paper or files should be kept in a cabinet. Staff must ensure paper or print outs are not left where unauthorised people can access them. EG. Printer. Data printouts should be shredded and disposed of securely when no longer required.
- Data stored electronically must be protected from unauthorised access, accidental deletion and malicious hacking attempts. Data should be protected by strong passwords that are changed regularly and never shared. Data stored on removable media (CD, DVD, USB) should be kept locked away securely when not being used. Data should only be stored on or uploaded to designated drives and servers. Servers containing personal data should be sited in a secure location away from public office space. Data should be backed up frequently, backups should be tested regularly in line with backup procedures. Data should never be saved directly to laptops or mobile devices like smart phones. All servers and computers containing data should be protected by approved security software and a firewall.
- Physical security of the premises includes an alarm on the premises, offices are locked, locked filing cabinets, online data management systems that are password protected, files are stored in appropriate places and a shredder is used to dispose of documents and printed data.

Disclosure to Third Parties

Whenever Roscommon CCC uses a third-party supplier to process personal data on its behalf, the Data Protection Officer (DPO) must ensure that this processor will provide security measures to safeguard personal data that is appropriate to the associated risks.

Roscommon CCC must contractually require the supplier to provide the same level of data protection. The supplier must only process personal data to carry out its contractual obligations for Roscommon CCC or upon the instructions of Roscommon CCC and not for any other purposes.

Examples of the responsibilities of third parties contracted by Roscommon CCC especially, IT companies:

- To ensure all systems, services and equipment used for storing data meet acceptable security standards
- Provide Roscommon CCC with verification statements and information in regards to the computer systems provided
- Perform regular checks and scans to ensure security hardware and software where personal data may be stored is functioning properly

Rights of Access by Data Subjects

When acting as a data controller, Roscommon CCC is responsible to provide data subjects with a reasonable access mechanism to enable them to access their personal data, and must allow them to update, rectify, erase, or transmit their Personal Data, if appropriate or required by law. The access mechanism will be further detailed in the Data Subject Access Request Procedure.

In certain circumstances (i.e. Child Protection and Welfare) the Data Protection Act allows personal data to be disclosed to relevant agencies in an appropriate manner without the consent of the data subject.

Data Portability

All individuals who are the subject of personal data held by Roscommon CCC are entitled to ask what information is held about them and why, find out how to gain access to it, be informed how to keep it up to date and have information on how Roscommon CCC is meeting its data protection obligations. Any such request will be dealt with in line with GDPR aiming for a response time of 30 calendar days.

Right to be forgotten

Upon request, data subjects have the right to obtain from Roscommon CCC the erasure of its personal data. This must be done only in compliance with any legal or statutory obligations.

Fair Processing Guidelines

Personal data must only be processed when explicitly authorised by the DPO.

The Company must decide whether to perform the Data Protection Impact Assessment for each data processing activity according to the Data Retention Policy and Data Protection Impact Assessment Guidelines.

Simply put if an employee decides to process, use personal data, that employee must get authorisation from the DPO. The DPO will then confirm if they have the consent to carry out that activity and should that employee have access to that personal information.

Notices to Data Subjects – Privacy Notice

At the time of collection, or before, collecting personal data for any kind of processing activities the DPO is responsible to properly inform data subjects of the following:

- the types of personal data collected
- the purposes of the processing
- processing methods
- the data subjects' rights with respect to their personal data,
- the retention period,
- if the data will be shared with third parties
- RCCC security measures to protect personal data.

This information is provided through the Privacy Notice. Where personal data is being shared with a third-party, the DPO must ensure that data subjects have been notified of this through a Privacy Notice. Where sensitive personal data is being collected, the DPO must make sure that the Privacy Notice explicitly states the purpose for which this sensitive personal data is being collected.

Obtaining Consent

The DPO is responsible for retaining a record of consent. The DPO is responsible for providing data subjects with options to provide the consent and must inform and ensure that their consent can be withdrawn at any time. Where collection of personal data relates to a child under the age of 16, the DPO must ensure that parental consent is given prior to the collection using the Parental Consent Form. Personal data must only be processed for the purpose for which they were originally collected. In the event that Roscommon CCC wants to process collected personal data for another purpose, Roscommon CCC must seek the consent of its data subjects in clear and concise writing for that new process. Any such request should include the original purpose for which data was collected, and also the new, or additional, purpose(s). The request must also include the reason for the change in purpose(s). Once consent is obtained, if Roscommon CCC decides in the future it wants to use that collected data for advertising a new service, they have to obtain consent again specifically for that.

Organisation Responsibilities

The responsibility for ensuring appropriate personal data processing lies with everyone who works for or with Roscommon CCC and has access to personal data processed by Roscommon CCC.

The key areas of responsibilities for processing personal data lie with the DPO who is: The Manager/Coordinator.

Data Protection Officer

The Data Protection Officer is responsible for:

- Informing and advising colleagues and the committee of their data protection obligations and keeping them aware about data protection responsibilities, risk and issues
- Monitoring the organisations GDPR compliance and reviewing all data protection procedures and related policies in line with an agreed schedule.
- Handling data protection questions from staff and anyone else covered by this policy.
- Working with other staff as necessary to ensure initiatives abide by data protection principles and approving any data protection statements attached to communications such as emails and letters.
- Dealing with requests from individuals to see that data Roscommon County childcare Committee CLG holds about the data subject.
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data and evaluating third party services used to store or process data (E.g.: send mode)
- Addressing any data protection queries from outside of the organisation
- Acting as a point of contact and co-operate with the data protection authority as required.

Response to Personal Data Breach Incidents

In Roscommon CCC we strive to ensure confidentiality in all of our communications with data subjects via email, post and text. When Roscommon CCC learns of a suspected or actual personal data breach, the DPO must perform an internal investigation and take appropriate remedial measures in a timely manner, according to the Data Breach Policy.

Where there is any risk to the rights and freedoms of data subjects, Roscommon CCC must notify the Irish Data Protection Authorities (Data Commissioner) without undue delay and within 72 hours. Data subjects will be notified if the breach results in 'high risk' to them. Records of all breaches will be kept by data controllers and processors.

What is a data breach?

There are many types of data breaches. For example, staff may be emailing a list of service providers an important notice from DCYA, you prepare the email and you accidentally add all of the service providers email addresses into the "To" field or the "Cc" field of the email and you send it – That is considered a data breach as you have emailed all on the list everyone else's email address. If you Bcc (Blind Carbon Copy) all email addresses this would be acceptable, as other email addresses cannot be seen.

Audit and Accountability

The DPO is responsible for auditing how well individuals implement this Policy. Checks will be carried out on the implementation of this policy regularly.

Any employee who violates this Policy will be subject to disciplinary action and the employee may also be subject to civil or criminal liabilities if his/her conduct violates laws or regulations.

Conflicts of Law

This Policy is intended to comply with the laws and regulations in Ireland in which Roscommon CCC operates. In the event of any conflict between this Policy and applicable laws and regulations, the latter shall prevail.

Reference Documents

There are certain legal documents that are relevant to this policy and we refer to these documents throughout. For your information these documents are listed below:

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)
- Irish Data Protection Act, 1988 and Amended Act 2003

Validity and document management

This document is valid from November 2019.

The owner of this document is the Board of Roscommon County Childcare Committee CLG, who must check and, if necessary, update the document at least once a year.

I confirm that I have received a copy of Roscommon County Childcare Committee CLG Data Protection Pack which is now included as an addendum to my Staff handbook and contract of Employment.

Signed by Employee: _____ **Date:** _____

Signed by: _____ **On behalf of Management or Chairperson of Board of Management.**

Appendix 2(A)

ROSCOMMON CCC CLG'S LETTER TO COMMUNITY SERVICES

Date

Subject: Data protection and you

Dear Early Years' Service,

As part of our work for the General Data Protection Regulation which came into force in May 2018 and in our role as the local agent of the Department of Children and Youth Affairs (DCYA), to support and advise Early Years services in County Roscommon we are currently reviewing and updating our database.

We would also like to attach Roscommon County Childcare Committee CLG's (Roscommon CCC) Data Protection policy. Roscommon CCC's privacy notices, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data Protection policy. We urge you to be aware of Roscommon CCC's Data Protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC collects personal data about your service in order to deliver local programmes and actions on behalf of DCYA. Roscommon CCC will hold your data as described throughout our Data Protection policy. Roscommon CCC

has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your Early Years' service.

Please see below your contact details as well as your committee member's details as they are currently on our database and we would like to update them. We would appreciate if you could enter any changes in the blank space provided and return this to us as soon as possible. This data base is reviewed annually and updated on an ongoing basis if requested by childcare services.

DCYA Reference Number	(PRE – POPULATED)
Service Name	
Service Address	
Eircode	
Service Phone Number	
Service email	

<u>Committee member details</u>			
Role	Contact Number	Email Address	Please tick if member is director
Chairperson Name:			
Secretary Name:			
Treasurer Name:			
Staff Liaison Name:			
Other Members Name:			
Other Members Name:			

We/I consent for these details to be continued to be included on Roscommon CCC database.

_____ (Chairperson's signature)

Please note: If you are stepping down from a committee or you no-longer sit on a committee, you can request to withdraw your data. Please submit a 'Data subject consent withdrawal form' to Roscommon CCC.

Please note that only the service details above are in the public domain and may be shared with parents and other interested parties and included on Roscommon CCC directory of childcare services which are published on Roscommon County Childcare Committee CLG website (www.roscommonchildcare.ie) and to be included in Roscommon County Childcare Committee CLG publications.

I /We consent for these details to be continued to be included in the "Directory of Childcare Services for County Roscommon" provided by Roscommon CCC and to be included in RCCC publications.

_____ (Chairperson Signature)

Important:

In line with our role of providing support, guidance and information to all childcare service providers in regards to the delivery of DCYA Programmes, AIM and other statutory regulations, national policy and quality standards we use various methods of communication.

While emails to services are used regularly, calling directly also provides a way for us to notify services, remind them of upcoming events or deadlines and to ensure that all services in our area are aware of updates and new information.

Please note: The contact details below are stored on our secure data management system and will not be shared with any third parties.

Out of hours phone number for service :	
--	--

We /I consent to be contacted for the purposes outlined above on the mobile phone number provided here

_____ (Signature)

Thank you for helping us with this task, please contact Manager/Data Protection Officer or Deputy Data Protection Officer for any queries in relation to this.

Kind Regards,

Data Protection Officer
Roscommon County Childcare Committee GLG

Appendix 2 (B)

ROSCOMMON CCC CLG LETTER TO PRIVATE EARLY YEARS SERVICES

Date

Subject: Data protection and you

Dear Early Years' Service,

As part of our work for the General Data Protection Regulation which came into force in May 2018 and in our role as the local agent of the Department of Children and Youth Affairs (DCYA), to support and advise Early Years services in County Roscommon we are currently reviewing and updating our database.

We would also like to attach Roscommon County Childcare Committee CLG's (Roscommon CCCC) and our Data Protection policy. Roscommon CCC's privacy notice, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data protection policy. We urge you to be aware of Roscommon CCC's Data protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC collects personal data about your service in order to deliver local programmes and actions on behalf of DCYA. Roscommon CCC will hold your data as described throughout the Data Protection policy. Roscommon CCC has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your Early Years' service.

Please see below your contact details as well as your committee member's details as they are currently on our database and we would like to update them. We would appreciate if you could enter any changes in the blank space provided and return this to us as soon as possible. This data base is reviewed annually and updated on an ongoing basis if requested by childcare services.

DCYA Reference Number	(PRE- POPULATED)
Service Name	
Service Address	
Eircode	
Service Phone Number	
Service email	

Please note that the service details above are in the public domain and maybe shared with parents and other interested parties and included on Roscommon CCC directory of childcare services which are published on Roscommon County Childcare Committee CLG website (www.roscommonchildcare.ie) and to be included in Roscommon County Childcare Committee CLG publications.

I /We consent for these details to be continued to be included in the “Directory of Childcare Services for County Roscommon” provided by Roscommon CCC and to be included in Roscommon CCC publications.

_____ (Signature)

Important:

In line with our role of providing support, guidance and information to all childcare service providers in regards to the delivery of DCYA Programmes, AIM and other statutory regulations, national policy and quality standards we use various methods of communication.

While emails to services are used regularly, calling directly also provides a way for us to notify services, remind them of upcoming events or deadlines and to ensure that all services in our area are aware of updates and new information.

Please note: The contact details below are stored on our secure data management system and will not be shared with any third parties.

Out of Hours Phone	
---------------------------	--

We /I consent to be contacted for the purposes outlined above on the mobile phone number provided here

_____ (Signature)

Thank you for helping us with this task, please contact Data Protection Officer or Deputy Data Protection Officer for any queries in relation to this.

Kind Regards,

Data Protection Officer
Roscommon County Childcare Committee GLG

Appendix 2 (C)

ROSCOMMON CCC CLG LETTER TO PARENT AND TODDLER GROUPS

Date

Subject: Data protection and you

Dear Parent and Toddler group,

As part of our work for the General Data Protection Regulation which came into force in May 2018 and in our role as the local agent of the Department of Children and Youth Affairs (DCYA), to support and advise Parent and Toddler groups in County Roscommon as well as administrate the Parent and Toddler grant initiative we are currently reviewing and updating our database.

We would also like to draw your attention to Roscommon County Childcare Committee CLG's (Roscommon CCCC) Data Protection policy. Roscommon CCC privacy notice, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data protection policy. We urge you to be aware of Roscommon CCC's Data protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC collects personal data about your group in order to deliver local programmes and actions on behalf of DCYA. Roscommon CCC will hold your data as described throughout the Data Protection policy. Roscommon CCC has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your service.

We would appreciate if you could enter any changes to your Parent and Toddler group information in the blank space provided and return this to us as soon as possible. This data base is reviewed annually and updated on an ongoing basis if requested by Parent and Toddler groups.

Parent and Toddler group name		
Address	(PRE-POPULATED)	
Group email		
	Contact number	Email
Chairperson Name:		
Treasurer Name:		
Day that group is on		

Please note that the details above are in the public domain and maybe shared with parents and other interested parties through our directory of Parent and Toddler groups on Roscommon County Childcare Committee CLG website (www.roscommonchildcare.ie) and to be included in Roscommon CCC publications.

I /We consent for these details to be continued to be included in the "Directory of Parent and Toddler groups for County Roscommon" provided by Roscommon CCC and to be included in Roscommon CCC publications.

_____ (Signature)

Important:

In line with our role of providing support and information to all Parent and Toddler groups in regards to the delivery of DCYA Programmes and other statutory regulations, national policy and quality standards we use various methods of communication.

While emails to groups are used regularly, calling directly also provides a way for Roscommon CCC to notify groups, remind them of upcoming events or deadlines and to ensure that all groups in our area are aware of updates and new information.

Please note: The contact details below such as mobile phone numbers provided to us are stored on our secure data management system and will not be shared with any third parties.

Alternative Contact number	
----------------------------	--

We /I consent to be contacted for the purposes outlined above on the mobile phone numbers provided above.

(Signature)

Thank you for helping us with this task, please contact Data Protection Officer for any queries in relation to this,

Kind Regards,

Manager / Data Protection Officer
Roscommon County Childcare Committee CLG

Appendix 2 (D)

ROSCOMMON CCC CLG LETTER TO CHILDMINDERS

Date

Subject: Data protection and you

Dear Childminder,

As part of our work for the General Data Protection Regulation which came into force in May 2018 and in our role as the local agent of the Department of Children and Youth Affairs (DCYA), to support and advise childminders in County Roscommon we are currently reviewing and updating our database.

We would also like to attach Roscommon County Childcare Committee CLG's (Roscommon CCCC) Data Protection policy. Roscommon CCC's privacy notice, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data protection policy. We urge you to be aware of Roscommon CCC's Data protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC collects personal data about your childminding service in order to deliver local programmes and actions on behalf of DCYA. Roscommon CCC will hold your data as described throughout the Data Protection policy. Roscommon CCC has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your service.

Please enter below your contact details as they are currently on our database and we would like to update them. We would appreciate if you could enter your information in the blank space provided and return this to us as soon as possible. This database is reviewed annually and updated on an ongoing basis if requested by childminders.

Name of Childminder	
Address	(PRE-POPLUATED)
Eircode	
Phone number	
Email address	

Please note that the details above are in the public domain and will be shared with parents and other interested parties through our directory of childminders on Roscommon County Childcare Committee CLG website (www.roscommonchildcare.ie) and to be included in Roscommon CCC publications.

I /We consent for these details to be continued to be included in the "Directory of childminders in County Roscommon" provided by Roscommon CCC and to be included in Roscommon CCC publications.

(Signature)

Important:

In line with our role of providing support and information to all childcare service providers in regards to the delivery of DCYA Programmes, AIM and other statutory regulations, national policy and quality standards we use various methods of communication.

While emails to childminders are used regularly, calling directly also provides a way for Roscommon CCC to notify childminders, remind them of upcoming events or deadlines and to ensure that all childminders in our area are aware of updates and new information.

Please note: The contact details below such as mobile phone numbers provided to us are stored on our secure data management system and will not be shared with any third parties.

Out of hours contact details	
-------------------------------------	--

We /I consent to be contacted for the purposes outlined above on the mobile phone number provided here

_____ (Signature)

Thank you for helping us with this task, please contact Data Protection Officer (DPO) for any queries in relation to this.

Kind Regards,

Manager / Data Protection Officer
Roscommon County Childcare Committee CLG

Appendix 2 (E)

ROSCOMMON CCC CLG LETTER TO SUPPLIERS

Date

Subject: Data protection and you

Dear Supplier,

As part of our work for the General Data Protection Regulation which came into force in May 2018 we are currently reviewing and updating our database.

We also attach Roscommon County Childcare Committee CLG's (Roscommon CCCC) Data Protection policy. Roscommon CCC's privacy notice, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data protection policy. We urge you to be aware of Roscommon CCC's Data Protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC collects data about your service in order to deliver local programmes and actions on behalf of DCYA. Roscommon CCC will hold your data as described throughout our Data Protection policy. Roscommon CCC has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your service.

Please ensure your contact details are correct as they are currently on our database and we would like to update them. We would appreciate if you could enter your information in the blank space provided and return this to us as soon as possible. This database is reviewed annually and updated on an ongoing basis if requested.

Supplier name inserted	
Address	PRE-POPULATED
Eircode	
Supplier phone number	
Alternative mobile number	
Email address	
Bank details for payment	
IBAN	
BIC	

I/We consent for the above details to be continued to be included in Roscommon CCC database to conduct business to contact our service and continue contact with Roscommon CCC. _____ (Signature)

Thank you for helping us with this task, please contact Data Protection Officer (DPO) for any queries in relation to this,

Kind Regards,
Data Protection Officer,
Roscommon County Childcare Committee CLG

Appendix 2 (F)

ROSCOMMON CCC CLG LETTER TO NATIONAL SCHOOLS

Date

Subject: Data protection and you

Dear National Schools

As part of our work for the General Data Protection Regulation which came into force in May 2018 and in our role as the local agent for the Department of Children and Youth Affairs (DCYA), to support and advise Early Years services, Parents, Childminders and Parent and Toddler groups in County Roscommon we are currently reviewing and updating our database.

We attach Roscommon County Childcare Committee CLG's (Roscommon CCCC) Data Protection policy. Roscommon CCC's privacy notice, consent forms and data subject request forms are attached as an appendix within Roscommon CCC's Data protection policy. We urge you to be aware of Roscommon CCC's Data protection policy and sign the below consent form and return it as soon as possible.

Roscommon CCC has been updating and developing policies to allow all our data subjects to be aware of what data we hold on them. For the above reasons we would like to amend the following data we hold on your service.

Please ensure your contact details are correct as they are currently on our database. We would appreciate if you could enter your information in the blank space provided and return this to us as soon as possible. This database is reviewed annually and updated on an ongoing basis if requested.

School name	
School address	
Eircode	
School phone number	
School Email	

We /I consent to be contacted for the purposes outlined above on the contact details provided above.

_____ (Signature)

Thank you for helping us with this task, please contact the Data Protection Officer (DPO) for any queries in relation to this,

Kind Regards,

Data Protection Officer
Roscommon County Childcare Committee CLG

(3) Data subject consent

(3) (A) ROSCOMMON CCC CLG DATA SUBJECT CONSENT FORM

I, _____ hereby give consent to Roscommon County Childcare Committee CLG (Roscommon CCC) to process my personal data for the purpose of the company's role to support and advise this service/group.

I am aware and I was informed that I may withdraw my consent at any time by using the Data Subject Consent Withdrawal Form and contacting Roscommon CCC Data Protection Officer at info@roscommonchildcare.ie or in writing to:

**Roscommon County Childcare Committee CLG,
Knock Road,
Castlerea,
Co. Roscommon.**

Signature:

Date:

Received by DPO, Roscommon County Childcare Committee CLG

Signature:

Date:

(3) Data subject consent

(3) (B) ROSCOMMON CCC CLG DATA SUBJECT CONSENT WITHDRAWAL FORM

I _____, would like to withdraw the consent to process my personal data by Roscommon County Childcare Committee CLG (Roscommon CCC).

Thus, Roscommon CCC no longer have my consent to process the personal data or the sensitive personal data for the purpose of all processing purposes, which was previously granted using the "DATA SUBJECT CONSENT FORM."

This withdrawal of consent does not affect the lawfulness of the processing activities up to this point.

Please send this form to Roscommon CCC Data Protection Officer (DPO) at info@roscommonchildcare.ie or post to:

**Roscommon County Childcare Committee CLG,
Knock Road,
Castlerea,
Co. Roscommon.**

Signature:

Date:

Received by DPO, Roscommon County Childcare Committee CLG

Signature:

Date:

(3) Data subject consent

**3(B) (I) ROSCOMMON CCC CLG ACKNOWLEDGEMENT OF YOUR DATA SUBJECT
CONSENT WITHDRAWAL**

Date

Subject: Acknowledgement of your Data Subject consent withdrawal

Dear [insert name]

Roscommon County Childcare Committee CLG acknowledge receipt of your Data Subject consent withdrawal form received on [date].

Roscommon CCC no longer have your consent to process the personal data or the sensitive personal data for the purpose of all processing purposes, which was previously granted using the "DATA SUBJECT CONSENT FORM." This withdrawal of consent does not affect the lawfulness of the processing activities up to this point. If you should require further support please do not hesitate to contact our office on 094 96 22540.

Yours sincerely,

Data Protection Officer (DPO)
Roscommon County Childcare Committee CLG.

(3) Data subject consent

(3) (C) ROSCOMMON CCC CLG DATA SUBJECT ACCESS REQUEST FORM

You have the right to request personal data Roscommon County Childcare Committee CLG (Roscommon CCC) may hold about you. This is known as a **Data Subject Access Request** ("DSAR"). A data subject is an individual who is the subject of the personal data. If you wish to make a DSAR, please complete the following form and return to Roscommon CCC by post or email.

Post Details If sending by post, please use the following address: Data Protection Officer, Roscommon County Childcare Committee CLG Knock Road, Castlerea, Co. Roscommon.
Email Information If sending by Email, please use the following address info@roscommonchildcare.ie Please write "Data Subject Access Request" in the subject field of the email so it is brought to our attention without delay.
1. Data Subject's Full Name
2. Data Subject's Current Address
3. Data Subject's Telephone Number

Work Phone No: _____	Mobile Phone No: _____
4. Details of data requested: To help us search for the information you require, please give us as much detail as possible (e.g. type of record) If Roscommon CCC does not receive sufficient information to locate the data you require, we may be unable to comply with your request.	
5. Is the information going to be sent to the data subject or his/her representative?	
To the data subject <input type="checkbox"/> To the representative <input type="checkbox"/>	
Please note, if the data is sent to the representative, then sections 7 and 8 need to be filled out.	
6. I confirm that I am the Data Subject.	
Signature: _____	
Print Name: _____	
Date: _____	
I enclose a copy of my ID and address proof documents (including a government issued ID document).	
7. The Data Subject written authorisation for the information to be released to an authorised representative.	
I hereby give my authorisation for _____ (name of the authorised representative) to request access to my personal data.	
Signature of Data Subject: _____	
Print name: _____	
8. (To be filled out by the representative of the data subject) Confirmation of the authorized representative of the Data Subject.	
Name of authorized representative and address where personal data is to be sent: _____ _____	
Signature: _____	
Print Name: _____	
Date: _____	
We will make every effort to process your data subject access request as quickly as possible within 30 calendar days. If you have any queries while your request is being processed, please do not hesitate to contact us on 094 96 22540 where the member of staff dealing with your request can advise.	

(3) Data subject consent

3 (C) (I) ROSCOMMON CCC CLG ACKNOWLEDGEMENT OF YOUR DATA SUBJECT ACCESS REQUEST

Date

Subject: Acknowledgement of your Data Subject Access Request

Dear [insert name]

Roscommon County Childcare Committee CLG acknowledge receipt of your Data Subject Access Request form received on [date]. We have now received all necessary information required to proceed with your request.

We will endeavour to provide the requested information within 30 calendar days.

If you should require further support please do not hesitate to contact our office on 094 96 22540.

Yours sincerely,

Data Protection Officer (DPO)
Roscommon County Childcare Committee CLG.

(3) Data subject consent

(3)(D) ROSCOMMON CCC CLG REQUEST FOR IDENTIFICATION LETTER

Date

Subject: Request for Identification

Dear

In order to enable Roscommon County Childcare Committee CLG (Roscommon CCC) to respond to your Subject Access Request dated, we need to

- i. Ensure we have received sufficient information to be able to verify the identity of the person making the request. Please provide us with a photo ID and proof of address in order to verify the request.
- ii. In the event of the request coming from somebody other than the data subject, acting on their behalf, Roscommon CCC would like to establish that the request is coming from somebody with the appropriate authority to do so. Please provide verification of this.

Yours sincerely,

Data Protection Officer (DPO) ,Roscommon County Childcare Committee CLG.

(3) Data subject consent

(3)(E) ROSCOMMON CCC CLG RESPONSE TO A DATA SUBJECT ACCESS REQUEST

Date:

Subject: Response to your Data Subject Access Request

Dear [Name],

In response to your Data Subject Access Request, Roscommon County Childcare Committee CLG can confirm that RCCC holds the following information on your *service/parent and Toddler group/ childminding service/staff members/supplier/other*;

Name:

Date of Registration:

Date finished in the Service:

DOB:

Contact Details:

Address

Telephone

Email

Other / Additional Information:

If you sound require further support or clarification on this subject, please do not hesitate to contact our office on 094 96 22540.

Yours sincerely,

Data Protection Officer (DPO), Roscommon County Childcare Committee CLG

(4) Data Breach

(4) (A) ROSCOMMON CCC CLG DATA BREACH NOTIFICATION FORM

DATA BREACH NOTIFICATION FORM TO DATA SUBJECTS

Dear

Roscommon County Childcare Committee CLG regret to inform you that we have been the subject of a personal data breach.

Please be informed that a data breach occurred, the details are outlined below.

Brief Description of Incident:	
Date of Incident:	
Location of Incident (if known):	
As a result of the above-mentioned breach, the personal data concerning you / your child might have been:	<input type="checkbox"/> Disclosed <input type="checkbox"/> Destroyed <input type="checkbox"/> Lost <input type="checkbox"/> Modified <input type="checkbox"/> Accessed <input type="checkbox"/> Other [Detail.....]
The following measures have been taken/will be taken to address the data breach and prevent similar situations from occurring:	[Review Data Protection Policy]

Additional actions implemented:	
--	--

If you have any questions or concerns regarding the data breach, please contact:

Contact Person:	Data Protection Officer
Contact details:	094 96 22540

Date issued: _____

Signed _____

Data Protection Officer
Roscommon County Childcare Committee CLG.

(4) Data Breach

(4) (B) NATIONAL BREACH NOTIFICATION FORM

Please download from Data Protection Commission website here:

https://www.dataprotection.ie/documents/gdpr_forms/National_Breach_Notification_Form.pdf

(4) Data Breach

(4) (C) ROSCOMMON CCC DATA BREACH REGISTRATION

Date of breach	Type/Nature of the breach	Description of the breach	Personal data affected	Number of data subjects affected	Number of data records affected	Details of Data protection officer	Consequences of the breach	Has data subjects been informed?	Actions implemented to prevent similar breaches in the future	Date of remediation completion	Additional information

(5) DATA PROTECTION PRINCIPLES

Roscommon CCC is considered a Data Controller. Therefore Roscommon CCC are responsible for the data that they obtain and have to demonstrate compliance with the data protection principles as listed below.

Everyone working for or with Roscommon CCC has a responsibility to ensure that data is collected, stored and handled appropriately. Each staff member must ensure that they handle and process data in line with this policy and data protection principles. The principles listed below outline the basic responsibilities for Roscommon CCC when handling personal data.

(A) Lawfulness, Fairness and Transparency

Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. (Regulation (EU) 2016/679, 2016).

There are three components to this principle; Lawfulness, Fairness and Transparency and they are all linked. The data subject will be told what processing will occur (Transparent), the actual processing will match this description (Fair), and finally the processing will match one of the six purposes specified in the GDPR (Lawful). Roscommon CCC relies on a GDPR fundamentals which are contractual and consent for processing data.

(B) Purpose limitation

Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with article 89(1), not be considered to be incompatible with the initial purposes. Regulation (EU) 2016/679, 2016).

Roscommon CCC will define up front what personal information we collect, how it is going to be used, for what purpose and we will limit using that information for these purpose(s) only.

This process will be completed through our privacy notice, our terms and conditions and our consent forms. These documents can be found in Roscommon CCC staff handbook, our data protection policy and on our website.

(C) Data minimisation

Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. Regulation (EU) 2016/679, 2016). Roscommon CCC will only collect/hold enough data to carry out the process, Roscommon CCC will not collect/hold what you don't need. Please refer to Roscommon CCC Retention policy for information on how long data is kept.

(D) Accuracy

The accuracy of the personal data is contested by the data subject, for a period enabling, the controller to verify the accuracy of the personal data. . Regulation (EU) 2016/679, 2016).

Any data that is being held needs to be accurate. Roscommon CCC strives to keep the personal information we hold up to date and accurate. Data Subjects, can request any information held on them, as this is their right, they can also request correction or completion of information relating them. (Please see Data Subject Access Request Procedure).

(E) Storage period limitation

Personal data must be kept for no longer than is necessary for the purposes for which the personal data are processed. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Regulation (EU) 2016/679, 2016).

If the information is no longer required it should be securely disposed of. Please refer to the "Data Retention Policy" and the "Appendix – Data Retention Table" for information on why Roscommon CCC keep data and for how long. It is taken into account the legal and contractual requirements and retention periods for information.

(F) Integrity and confidentiality

Processed in a manner that ensures appropriate security of personal data, including preventing unauthorised access to or use of personal data and the equipment used for the processing. Regulation (EU) 2016/679, 2016).

Every employee does not need access to the personal information that Roscommon CCC collects. Only those that require access should have it. The physical security of the filing cabinets and rooms are to be considered and access to any electronic devices that hold personal data will be restricted accordingly.

(G) Accountability

The controller shall be responsible for, and be able to demonstrate compliance with (principles relating to processing of personal data). Regulation (EU) 2016/679, 2016).

Roscommon CCC is responsible for and must be able to demonstrate compliance with the principles outlined above. If a third-party contractor, for example, a computer contractor, provides Roscommon CCC with services, Roscommon CCC have a contract of services with that third-party provider, and this contract will include processes that outline that any personal information processed by the third party is being done so in compliance with the six principals outlined above. This is very important as Roscommon CCC remain responsible for the personal data even if the third party are responsible for a data breach.

(6) DEFINITIONS

Roscommon CCC have listed below a number of key definitions of terms that are used in this document for your information. These definitions are specifically drawn from Article 4 of the European Union's General Data Protection Regulation:

(i) Personal Data

Any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, mental, economic, cultural, or social identity of that natural person. (Regulation (EU) 2016/679, 2016).

Personal Data includes a natural person's email address, telephone number, biometric information (such as fingerprint), location data, IP address, health care information, religious beliefs, Social Security number, marital status etc.

(ii) Sensitive Personal Data

Particularly sensitive data includes data in relation to fundamental rights and freedoms, where disclosure of such data could lead to physical damage, financial loss, damage to the reputation, identity theft or fraud or discrimination etc. Sensitive personal data usually includes but not limited to personal data revealing racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership, as well as genetic data, biometric data (fingerprint) for the purpose of uniquely identifying a natural person, and data concerning a natural person's health or sexual orientation.

(iii) Processing

Processing means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination, restriction, erasure, or destruction of the data (Regulation (EU) 2016/679, 2016).

(iv) Data Controller

The natural or legal person, public authority, agency or any other body, which alone or jointly with others, determines the purpose and means of the Processing of Personal data. Where the purposes and means of such processing are determined by Union or Member state law, the controller or the specific criteria for its nomination may be provided for by Union or member state (Regulation (EU) 2016/679, 2016).

(v) Data Processor

A natural or legal person, public authority, agency or any other body which processes personal data on behalf of a Data Controller (Regulation (EU) 2016/679, 2016).