

LIMERICK COMMUNITY BASED EDUCATION INITIATIVE

DATA PROTECTION POLICY

Introduction

It is necessary for L.C.B.E.I. in the course of its business, to collect and use data (information in a form which can be processed for a variety of reasons about its staff, students/learners and other individuals: for example, the organisation and administration of courses, the recruitment and payment of staff, and compliance with statutory obligations. To enable this process L.C.B.E.I. has adopted the eight rules of the Data Protection Commissioner.

The Eight Rules of Data Protection

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up to date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes
8. Give a copy of his/her personal data to an individual, on request

1. Obtain and process information fairly

The data subject must be made aware of the data collection process.

- The name of the data controller The Project Manager
- The purpose of collecting data.
- The identity of any representative nominated for the purposes of the Acts.
- The persons or categories of persons to whom the data may be disclosed: Project management & Board of Directors and beneficiaries.
- Whether replies to questions asked are obligatory and the consequences of not providing replies to those questions.
- The existence of the right of access to their personal data.
- The right to rectify their data if inaccurate or processed unfairly.
- Any other information which is necessary so that processing may be fair and to ensure the data subject has all the information that is necessary so as to be aware as to how their data will be processed.

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

L.C.B.E.I. keeps data for a purpose that is specific, lawful and clearly stated and the data is processed in a manner compatible with that purpose. An individual has a right to question the purpose for which L.C.B.E.I. hold his/her data.

To comply with this rule:

- In general a person should know the reason/s why L.C.B.E.I. is collecting their data.
- The purpose for which the data is being collected is a lawful one.

3. Use and disclose it only in ways compatible with these purposes.

- L.C.B.E.I. use the data only in ways consistent with the purpose(s) for which they are kept
- L.C.B.E.I. discloses the data only in ways consistent with that purpose.

4. Keep it safe and secure

- Appropriate security measures are taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction.
- Access to central IT servers is restricted in a secure location to a limited number of staff with appropriate procedures for the accompaniment of any non-authorized staff or contractors.
- Access to any personal data within the organisation is restricted to authorised staff on a 'need to know' basis in accordance with a defined policy.
- Access to computer systems is password protected.
- Information on computer screens and manual files is kept hidden from callers to our offices.
- Back-up procedure is in operation for computer held data, including off site back-up data.

- All reasonable measures are taken to ensure that staff are made aware of the organisation's security measures, and comply with them.

Noted:

- Outside Backup,
- Files are secure with locked cabinets,
- Computers are code protected and anti-virus protected.
- L.C.B.E.I. office is a locked premises within L.E.D.P. Park which is a secure location with 24 hour security.
- Twenty four hour security on building. No data held on mobiles or laptop.

- All waste papers, printouts, etc. to be disposed of carefully.

- A designated person is responsible for security and for periodic reviews of the measures and practices in place.

5. Keep it accurate, complete and up-to-date.

Clerical and computer procedures are adequate with appropriate cross-checking to ensure high levels of data accuracy.

The general requirement to keep personal data up-to-date has been fully examined.

Appropriate procedures are in place, including periodic review and audit, to ensure that each data item is kept up-to-date.

6. Ensure that it is adequate, relevant and not excessive

We seek and retain only the minimum amount of personal data which we need to achieve our purposes(s). We have specific criteria by which to assess what is adequate, relevant, and not excessive and apply those criteria to each information item and the purpose/s for which it is held.

To comply with this rule the information sought and held is:

- Adequate in relation to purpose/s for which it is sought
- Relevant in relation to the purposes/s for which it is sought.
- Not excessive in relation to the purpose

A periodic review is carried out of the relevance of the personal data sought from data subjects through the various channels by which information is collected, i.e. forms, website etc.

In addition, a review is undertaken on the above basis of any personal information already held.

7. Retain it for no longer than is necessary for the purpose or purposes

Personal data collected for one purpose cannot be retained once that initial purpose has ceased. Personal information is not retained any longer than necessary.

L.C.B.E.I. Policy of Retention

- Data files are held for a minimum of 7 years
- The following data is kept re each student
Student Name, contact details, college attended, course, level, grant awarded, completion date.
- Only data in relation to the outcomes for individuals who have participated is retained, to enable assessment of the effectiveness of the L.C.B.E.I. initiative.

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

On making an access request any individual about whom L.C.B.E.I. keep personal data is entitled to:

- A copy of the data kept about him or her
- To know the categories of their data and our purposes for processing it.
- To know the identity of those to whom you disclose the data.
- To know the source of the data, unless it is contrary to public interest.

To make an access request the data subject must:

- Apply in writing (which can include email).
- Give any details which might be needed to help identify him/her and locate all the information we may keep about him/her e.g. previous addresses, student account numbers.

In response to an access request L.C.B.E.I. agree to:

- Supply the information to the individual promptly and within 40 days of receiving the request, except during periods of office closure
- Provide the information in a form which will be clear

If L.C.B.E.I. does not hold any information about the individual making the request we will endeavour to inform them within the 40 days.

