

Data Protection Policy – Sneem Enterprise Centre

Policy information	
Organisation	Sneem Enterprise Centre, which is also the Data Controller
Scope of policy	This policy applies to: <ul style="list-style-type: none"> • Sneem Enterprise Centre; • all sessional, paid and volunteer workers operating on behalf of Sneem Enterprise Centre.
Policy operational date	16 th . February, 2015.
Policy prepared by	Drew Borrett, Sneem Enterprise Centre committee member.
Date approved by Management Committee	16 th . February, 2015
Policy review date	1 st . March, 2018.
Policy last amended	22 nd . October, 2016.
Introduction	
Purpose of policy	The purpose of this policy is to enable Sneem Enterprise Centre to: <ul style="list-style-type: none"> • comply with the law in respect of the data it holds about individuals; • follow good practice; • protect Sneem Enterprise Centre’s supporters, staff and other individuals • protect the organisation from the consequences of a breach of its responsibilities.
Personal data	This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of ‘data’ in the Act.
Policy statement	<p>Sneem Enterprise Centre will:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals’ rights • be open and honest with individuals whose data is held • provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently <p>Sneem Enterprise Centre recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:</p> <ul style="list-style-type: none"> • keeping information securely in the right hands, and • holding good quality information. <p>Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, Sneem Enterprise Centre will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
Key risks	Sneem Enterprise Centre has identified the following potential key risks, which this policy is designed to address: <ul style="list-style-type: none"> • Breach of confidentiality (information being given out

	<p>inappropriately).</p> <ul style="list-style-type: none">• Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed• Failure to offer choice about data use when appropriate• Breach of security by allowing unauthorised access.• Failure to establish efficient systems of managing changes, leading to personal data being not up to date.• Harm to individuals if personal data is not up to date• Insufficient clarity about the way sessional workers' or volunteers' personal data is being used e.g. given out to the general public.• Failure to offer choices about use of contact details for staff, volunteers or sessional workers.• Data Processor contracts
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Responsibilities	
Trustees	The committee recognises its overall responsibility for ensuring that Sneem Enterprise Centre complies with its legal obligations.
Data Protection Officer	The Data Protection Officer is currently Alan Davies, with the following responsibilities: <ul style="list-style-type: none"> • Briefing the committee on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising others on Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Other staff	Kerry GeoPark staff assist by monitoring Sneem Enterprise Centre's e-mail account.
Staff & volunteers	All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.
Enforcement	Significant breaches of this policy will be handled under Sneem Enterprise Centre's disciplinary procedures.
Confidentiality	
Access to data	Access will be defined on a "need to know" basis; no one will have access to information unless it is relevant to their work
Communication with Data Subjects	Sneem Enterprise Centre will produce a privacy statement for Data Subjects, setting out how their information will be used. This will be available on request, and a version of this statement will also be available on the Sneem Enterprise Centre website. (See Appendix A.)
Communication with staff	Staff, volunteers and sessional workers are required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities. (See Appendix B.)
Authorisation for disclosures not directly related to the reason why data is held	Where anyone within Sneem Enterprise Centre feels that it would be appropriate to disclose information in a way contrary to the confidentiality policy, or where an official disclosure request is received, this will only be done with the authorisation of the Data Protection Officer. All such disclosures will be documented.

Security	
Scope	This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.
Specific risks	<p>Sneem Enterprise Centre has identified the following risks:</p> <ul style="list-style-type: none"> • Information passing between Sneem Enterprise Centre and potential client companies could go astray or be misdirected. • Staff or volunteers with access to personal information could misuse it. • Sessional workers or, more likely, volunteers could continue to be sent information after they have stopped working for Sneem Enterprise Centre, if their records are not updated promptly. • Poor website security might give a means of access to information about individuals once individual details are made accessible online. • Staff may be tricked into giving away information, either about supporters or colleagues, especially over the phone, through "social engineering".

Data recording and storage	
Accuracy	<p>Sneem Enterprise Centre has a single database holding basic information about all employment candidates.</p> <p>Sneem Enterprise Centre will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> • ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data. • Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets. • Effective procedures will be in place so that all relevant systems are updated when information about any individual changes. • Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
Retention periods	Sneem Enterprise Centre will establish retention periods for all categories of data.

Subject access	
Responsibility	Any subject access requests will be handled by the Data Protection Officer.
Procedure for making request	Subject access requests must be in writing. All staff and volunteers are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.
Provision for verifying identity	Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.
Charging	Sneem Enterprise Centre will not charge for subject access.
Procedure for granting access	The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

Transparency	
Commitment	<p>Sneem Enterprise Centre is committed to ensuring that in principle Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed; • what types of disclosure are likely; and • how to exercise their rights in relation to the data.
Procedure	<p>Data Subjects will generally be informed when they sign up, whether on paper or online.</p> <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p>

Consent	
Underlying principles	<p>Information about data subjects will be made public only with their consent. (This includes photographs.)</p> <p>'Sensitive' data about members and supporters will be held only with the knowledge and consent of the individual.</p>
Forms of consent	Consent of disclosure of a data subject's information will be indicated on the form completed to enable their entry to the skills database.
Opting out	Sneem Enterprise Centre will make provision for data subjects to opt out of certain categories of disclosure.
Withdrawing consent	Sneem Enterprise Centre acknowledges that, once given, consent can be withdrawn, but not retrospectively.

Appendix A: Privacy statement

This statement explains how we look after information that we collect and what we do with it.

We have a legal duty under the Data Protection Act to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information or service you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, either ask for an application form to be sent to you, or write to the Data Protection Officer at Sneem Enterprise Centre. There is no charge for a copy of your data. We aim to reply as promptly as we can and, in any case, within the legal maximum of 40 days.

Appendix B: Confidentiality statement for staff and volunteers

When working for Sneem Enterprise Centre, you will often need to have access to confidential information.

Sneem Enterprise Centre is committed to keeping this information confidential, in order to protect people and Sneem Enterprise Centre itself. 'Confidential' means that all access to information must be on a need to know and properly authorised basis. You must use only the information you have been authorised to use, and for purposes that have been authorised. You should also be aware that under the Data Protection Act, unauthorised access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by Sneem Enterprise Centre to be made public.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:

- not compromise or seek to evade security measures (including computer passwords);
- not gossip about confidential information, either with colleagues or people outside Sneem Enterprise Centre;
- not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate.

Your confidentiality obligations continue to apply indefinitely after you have stopped working for Sneem Enterprise Centre.

I have read and understand the above statement. I accept my responsibilities regarding confidentiality.

Signed:

Date: