



# Data Protection Policy

## **Purpose of This Policy**

This policy is a statement of the commitment of The Sisters of St. John of God, Irish Region to protect the rights and privacy of individuals in accordance with the Data Protection Act.

## **Individuals' Responsibilities**

Any staff member of The Sisters of St. John of God, Irish Region who are involved in the collection, storage or processing of personal data has responsibilities under the legislation.

Any staff member involved in the processing/storing of personal data should make sure;

- to obtain and process personal data fairly
- to keep such data only for explicit and lawful purposes
- to disclose such data only in ways compatible with these purposes
- to keep such data safe and secure
- to keep such data accurate, complete and up-to-date
- to ensure that such data is adequate, relevant and not excessive
- to retain such data for no longer than is necessary for the explicit purpose
- to give, on request, a copy of the data to the individual to whom they relate, such a request is known as an ACCESS REQUEST

Any data access requests received should be forwarded immediately to the Data Processor\*

The access requests will be logged and replied to within a month.

## **Individual Rights**

The individuals for whom The Sisters of St. John of God, Irish Region store personal data have the following rights:

- to have their personal data obtained and processed fairly
- to have personal data kept securely and not illegitimately disclosed to others
- to be informed where possible the identity of the Data Controller\* and the purpose for which the information is held
- to get a copy of their personal data
- to have their personal data corrected if inaccurate or deleted if no longer required
- under Employment Rights, not to be forced to disclose information to a prospective employer. No one can force another person to make an access request, or reveal the results of an access request, as a condition of recruitment, employment or provision of a service. Where vetting for employment purposes is necessary, this can be facilitated where the individual gives consent to the Data Controller\* to release personal data to a third party

## **Principles of the Acts**

The Sisters of St. John of God, Irish Region will administer its responsibilities under the legislation in accordance with the eight stated data protection principles outlined in the Act as follows:

**1. *Obtain And Process Information Fairly***

The Sisters of St. John of God, Irish Region will obtain and process personal data fairly and in accordance with the fulfilment of its functions.

**2. *Keep Data Only For One or More Specified, Explicit And Lawful Purposes***

The Sisters of St. John of God, Irish Region will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes.

**3. *Use And Disclose Data Only in Ways Compatible With These Purposes***

The Sisters of St. John of God, Irish Region will only disclose personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data.

**4. *Keep Data Safe And Secure***

The Sisters of St. John of God, Irish Region will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. The Sisters of St. John of God are aware that high standards of security are essential for all personal data.

**5. *Keep Data Accurate, Complete And Up-to-date***

The Sisters of St. John of God, Irish Region will have procedures that are adequate to ensure high levels of data accuracy. The Sisters of St. John of God will examine the general requirement to keep personal data up-to-date. The Sisters of St. John of God will put in place appropriate procedures to assist staff in keeping data up-to-date.

**6. *Ensure That Data is Adequate, Relevant and Not Excessive***

Personal data held by The Sisters of St. John of God, Irish Region will be adequate, relevant and not excessive in relation to the purpose/s for which it is kept.

**7. *Retain Data for No Longer Than Is Necessary for The Purpose or Purposes for Which It Is Kept***

The Sisters of St. John of God, Irish Region will have a procedure on retention periods for personal data (See Appendix 2).

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

The Sisters of St. John of God, Irish Region will have procedures in place to ensure that Data Subjects\* can exercise their rights under the Data Protection Legislation.

**Roles/Responsibilities of The Sisters of St. John of God**

The Sisters of St. John of God, Irish Region have overall responsibility for ensuring compliance with the Data Protection Legislation. However, all employees of The Sisters of St. John of God who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation. The Sisters of St. John of God will provide support, assistance, advice and training to all relevant Departments, Offices and staff to ensure it is in a position to comply with the legislation.

**Procedures and Guidelines**

This policy supports the provision of a structure to assist The Sisters of St. John of God, Irish Region to comply with the Data Protection Legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

## Review

This Policy will be reviewed regularly in light of any legislative or other relevant indicators.

This policy is hereby signed on behalf of the Regional Leadership Team.

Signed:

*Geraldine Fitzpatrick*

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Sr. Geraldine Fitzpatrick  
Regional Leader

24<sup>th</sup> May 2018  
Date

- \*Data Subject is an individual who is the subject of the personal data
- \*Data Controller controls the contents and use of personal data
- \*Data Processor is the person who processes personal data on behalf of the Data Controller