

Data Protection Policy

Revision & Approval

Rev.	Approval Date	Nature of Changes	Submitted By (Name & Role)	Board or Sub-Committee Approval (Name)
01	11/10/2019	Reissue for new ISO formatting	V. Leatham	K. Lane

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1. Purpose

This policy is to outline ALONEs commitment and structures in place in relation to Data Protection.

2. Scope

This policy relates to all personal data received and processed by ALONE.

3. Roles and Responsibilities

- The Data Protection Coordinator has responsibility for maintaining this procedure. However, all staff, volunteers, or anyone processing data on behalf of ALONE are to follow the principles outlined within this policy.

4. Associated Documents

Reference	Document Type	Document Title
n/a	Legislation	General Data Protection Regulations
ISO 9001	Standard	Quality Management Systems: Requirements
PL-QLT-01	Policy	ALONE Quality Policy
PR-OPS-01	Procedure	Data and Information Management

5. Policy

Data Protection Legislation: ALONE holds all data in line with the Data Protection Act 1988, the Data Protection (Amendment) Act 2003, and The EC (privacy and Electronic Communications) regulations, 2011.



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ALONE operates our services in a rights based manner and we respect the information we hold about individuals. ALONE holds all data in line with the General Data Protection Regulation (GDPR).

We abide by principles set down by the Data Protection Commissioner which are summarised in this policy.

The main principles that ALONE abide by are that data is:

1. Processed **lawfully, fairly** and in a transparent manner in relation to the data subject
2. Collected for **specific**, explicit and legitimate purposes and not further processed in a manner that is incompatible with those **purposes**
3. Adequate, relevant and **kept limited** to what is necessary in relation to the purposes for which they are processed
4. **Accurate** and, where necessary, **kept up to date**
5. Ensure that it is **adequate, relevant** and not excessive in how it is **stored**
6. **Confidential and secure**- protecting the integrity and privacy of data by making sure its secure (which extends to IT systems, paper records and physical security)
7. **Retained** for no longer than is necessary.
8. **Available** to give a copy of to the relevant individual, on request

How ALONE follow these principles is detailed below:

1. Obtain and process information fairly

- At the time of providing personal information, individuals are made fully aware of the identity of the persons who are collecting it, to what use the information will be put and the persons or category of persons to whom the information will be disclosed.
- Secondary or future uses, which might not be obvious to individuals, will be brought to their attention at the time of obtaining personal data
- In accordance with ALONEs quality procedures, consent is recorded according to the manner in which it was obtained and whom by
- If ALONE has information about people and wishes to use it for a new purpose (which was not disclosed and perhaps not even contemplated at the time the information was collected), ALONE provide individuals with an option to indicate whether or not they wish their information to be used for the new purpose
- The data subject is made aware of their rights under GDPR

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

- We are clear about the purposes for which we keep personal information
- Only the minimum necessary personal data will be sought and retained
- Departmental procedures ensure the information kept is aligned with the requirements of each department

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

- If ALONE uses a third party to process personal data on its behalf the processing of such data will be covered by contract. The contract should stipulate at least the following:
 - The conditions under which data may be processed;
 - The minimum security measures that the data processors must have in place;
 - Some mechanism or provision that will enable ALONE to ensure that the data processor is compliant with the security requirement.
- ALONE recognise that disclosure of personal data without the individual data subject's consent is permitted in certain limited circumstances including:
 - Where disclosure is necessary to prevent injury or damage to the health of an individual
 - Where such disclosure is required by law
 - Where disclosure is made to the Gardaí in relation to a criminal investigation

4. Keep Data accurate, complete and up-to-date

- The accuracy of the information on older people who use our services is monitored through regular care plan updates, monitoring and communication.
- Our departmental quality procedures ensure that our databases are kept up-to-date by the staff responsible for them through regular monitoring and communications with those we engage with.

5. Ensure data is adequate, relevant and not excessive

- We collect all the information we need to deliver our services effectively, and to deal with individuals in a fair and comprehensive manner.
- The information we collect is relevant, and not excessive, for our purposes.

6. Keep Data safe and secure

- All desktop computers, laptops, and mobile devices are password-protected.
- Access to our CRM is protected by individual user passwords
- Appropriate user permissions are in operation when accessing our CRM restricting access rights to personal data and is subject to monitoring
- Our filing cabinets containing personal information are securely locked when the office is unattended.
- All removable storage devices are password protected
- Where an incident gives rise to a risk of unauthorized disclosure, loss, destruction or alteration of personal data, in manual or electronic form, we will notify affected data subjects in most such cases and notify the Office of the Data Protection Commissioner.
- The principles of a clean desk policy have been incorporated into procedure processes.

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- 7. Retain data for no longer than is necessary for the purpose or purposes**
 - ALONE follow recommended timelines for the disposal and destruction of data.

- 8. Give a copy of his/her personal data to that individual, on request**
 - ALONE will give a copy of his/her personal data to any individual, on request.
 - All individuals are informed they have a right to access to information about them held by ALONE.
 - A person can exercise their rights of access by writing to ALONE.
 - Once ALONE have received an Access Request and are satisfied as to the identity of the applicant and that the address and / or email address (as relevant) is correct, ALONE will respond within one month, although this may be extended in exceptional circumstances.