



## **Irish Association of Youth Orchestras**

### **Policy Control Document**

To be attached preceding the front cover of all hard and soft-copies of the policy.

**Policy Name:** Data Protection Policy

(The "Personal Information Collected by IAYO" document forms part of this policy but is stored as a separate file.)

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Clare Daly

Chairperson (Name)



Chairperson (Signature)

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CEO (Name)



CEO (Signature)



**Irish Association of Youth Orchestras**

**Data Protection Policy**

**November 2021**

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# Data Protection Policy

This Data Protection Policy provides information about the ways in which the Irish Association of Youth Orchestras CLG collects, stores and uses personal information relating to individuals and their rights in relation to that information.

## Who We Are

We are the Irish Association of Youth Orchestras CLG, the all-Ireland resource organisation for youth orchestras.

We can be contacted by email at [info@iayo.ie](mailto:info@iayo.ie), by phone on +353 (0)21 421 5185, on mobile phone / WhatsApp on +353 (0)86 057 0062.

## Data Protection Statement

- The Irish Association of Youth Orchestras CLG (IAYO) collects and processes data about individuals in order to provide the services that we offer and to ensure the wellbeing and safety of all those who participate in our activities.
- Any personal data that is provide to IAYO will be treated with the highest standards of security and confidentiality in accordance both with Irish and European Data Protection legislation (GDPR).
  - Further details on GDPR can be found at the website for the Data Protection Commissioner at [www.dataprotection.ie](http://www.dataprotection.ie).
- For the purposes of GDPR, IAYO will be the “controller” of all personal data held.
- We will use data only for the purpose(s) for which it has been obtained and those purposes will be clearly detailed on any forms on which information is requested by us.
- We will never sell your information.
- We may pass personal information to third parties who are service providers, agents and subcontractors to us for the purpose(s) of completing tasks and providing services to individuals on our behalf (i.e. for booking accommodation, insurance purposes or brochure production). In such cases, we disclose only the personal information that is necessary for the third party to deliver the service and we require them to keep information secure and not to use it for their own purposes.
- Information provided to IAYO may also be passed to third parties in fulfilment of our legal obligations. Disclosures required or permitted under law include:
  - serious concerns that there may be a threat to the safety or life of any person;
  - in the context of criminal behaviour and disclosures required by legal process;
  - in the context of child safeguarding concerns.
- We reserve the right to amend this Data Protection Policy from time to time without prior notice. The most up-to-date version of this policy will be available on our website ([www.iayo.ie](http://www.iayo.ie)). Amendments will not be made retrospectively.
- If you have any concerns or complaints, you can raise these with the board of IAYO or with the Data Protection Commissioner:

Data Protection Commissioner,  
Canal House,  
Station Road,  
Portarlinton,  
R32 AP23  
County Laois

## Key Responsibilities

IAYO has certain key responsibilities in relation to the information which we keep about individuals - on computer, in the cloud or in manual files. These may be summarised in terms of six "rules" or Data Protection Principles which we must follow:

1. Obtain and process the information fairly, transparently and legally ('lawfulness, fairness and transparency');
2. Keep it only for one or more specified and lawful purposes and process it only in ways compatible with the purposes for which it was given to us initially (purpose limitation);
3. Keep it safe and secure (integrity and confidentiality);
4. Keep it accurate and up-to-date (accuracy);
5. Ensure that it is adequate, relevant and not excessive (data minimisation);
6. Retain it no longer than is necessary for the specified purpose or purposes (storage limitation);
7. Give a copy of personal data to any individual on request.

### Obtain and Process Information Fairly, Transparently and Legally

For data to be obtained fairly, individuals will, at the time the data is being collected, be directed to this policy and therefore made aware of:

- The identity of the data controller (Irish Association of Youth Orchestras CLG)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed.
- Any other information that is necessary so that the processing may be fair.

IAYO will meet its obligations as follows:

- The informed consent of the individual will be sought before their data is processed;
- IAYO will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, consent, legitimate interest;
- Where IAYO intends to take photos or record activity on video, written consent will be required;
- Processing of the personal data will be carried out only as part of IAYO's lawful activities, and it will safeguard the rights and freedoms of the individuals;

## **Keep Information Only for One or More Specified and Lawful Purposes**

During the process of its work, IAYO collects and retains data in relation to IAYO membership, course applications, player medical and rules forms, player teacher contact details, participants and staff tutors feedback, recruiting and managing contract staff, referencing staff, garda vetting, garda vetting for under 18s, mailing lists, trustees, managing full-time / permanent employees, job applications and recruitment, our friends programme, health and safety, child safeguarding, expenses and payroll.

The precise nature of information collected and processed, the legal grounds for processing and retention periods are set out in an information processing matrix that is reserved for internal use. Any person(s) or organisation(s) that have reasonable grounds shall be allowed to view relevant parts of the matrix.

## **Process Information Only in Ways Compatible with the Purposes for which it was Initially Given**

IAYO will obtain data for purposes which are specific, lawful and clearly stated, in line with Article 6 of GDPR and in line with the purposes set out in our information processing matrix. Any individual will have the right to question the purpose(s) for which IAYO holds their data and IAYO will be able to clearly state that purpose or purposes. IAYO will ensure that data is not reused for a different purpose that the individual did not agree to or would reasonably expect.

## **Keep Information Safe and Secure**

IAYO will employ the following standards of security in order to protect the personal data under its care.

- All electronically held information shall be password protected with information restricted to those staff and / or trustees that have need to access it.
- IAYO-owned computers shall be subject to full-disk encryption.
- For off-site work where information is required, such information shall be stored in password-protected files or on encrypted media and deleted once the off-site work is complete.
- All data will be kept within the EU in so far as this can be controlled.
  - We rely on multi-national organisations operating in Ireland to comply with EU laws in this matter.
  - A Data Protection Impact Assessment will be carried out when any new cloud-based personal-data storage and processing services are engaged.
- We implement generally-accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- Special Categories of data in physical / paper formats (i.e. Garda vetting; personal data relating to children) shall be kept in secure locations.
- IAYO will use a recognised online secure payment system when taking payments online.
- IAYO will notify affected parties promptly in the event of any breach of personal data which might expose them to serious risk.

## **Keep Information Accurate and Up-to-date**

Insofar as is possible, IAYO will:

- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
- conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date;
- conduct regular assessments in order to establish the need to keep personal data.

### **Ensure that Information is Adequate, Relevant and not Excessive**

IAYO will ensure that the data it processes in relation to individuals are relevant to the purposes for which those data are collected. Data which is not relevant to such processing will not be acquired or maintained. Personal data will only be disclosed in ways that are necessary or compatible with the purpose for which the data are kept. Special attention is paid to the protection of special categories of personal data, the disclosure of which would normally require explicit consent or one of the other specified lawful bases.

### **Retain Information no Longer than is Necessary for the Specified Purpose or Purposes**

IAYO has identified a range of data categories, with reference to the appropriate data retention period for each category. This applies to data in both a manual and electronic format.

Once the respective retention period has elapsed, IAYO undertakes to destroy, erase or otherwise put this data beyond use. Retention periods are set out in our information processing matrix. Any person(s) or organisation(s) that have reasonable grounds shall be allowed to view relevant parts of the matrix.

### **Give a Copy of Personal Data to any Individual on Request.**

Individuals whose data is collected and processed by IAYO have rights under the GDPR as follows:

- a) to access their personal data;
- b) to be provided with information about how their personal data is processed;
- c) to have their personal data corrected;
- d) to have their personal data erased in certain circumstances;
- e) to object to or restrict how their personal data is processed;
- f) to withdraw their permission to have their data processed;
- g) to have their personal data transferred to them or to another business in certain circumstances;
- h) to take any complaints about how we process their personal data to the Data Protection Commissioner:

[www.dataprotection.ie/docs/complaints/](http://www.dataprotection.ie/docs/complaints/)  
+353 57 8684800

Data Protection Commissioner,  
Canal House,  
Station Road,  
Portarlinton,  
R32 AP23  
County Laois

Should an individual be unsatisfied with the handling of their request for information, they shall have a right for the matter to be brought to the Board of IAYO in line with the IAYO Complaints Policy.

In the case of an individual under 18, IAYO reserves the right to consult with one or both guardians in judging the validity of a data access request.