



BAT CONSERVATION IRELAND

Data Protection Policy and Procedures

Bat Conservation Ireland

FINAL 2021

Policy Statement

Bat Conservation Ireland is committed to protecting the rights and privacy of individuals in accordance with data protection legislation, both as a data controller and as a data processor. To comply with the law, Bat Conservation Ireland ensure that personal data is collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. Furthermore, requests for access are dealt with properly.

General principles

Scope

This policy covers any individual about whom Bat Conservation Ireland collects and processes personal data (that is, data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information). This includes both electronic and manual records, regardless of when these were created. Controlling and processing data includes collecting, recording, storing, altering, disclosing, destroying and blocking.

Responsibility

The Administrative Manager is responsible for data protection and bears overall responsibility for ensuring compliance with data protection legislation, and for ensuring that the policy and procedures in this document are implemented efficiently and effectively. All council members, staff, volunteers and interns must co-operate with the Administrative Manager when carrying out her/his duties. The Administrative Manager is also available to answer queries or deal with concerns about data protection.

Measures

These procedures list the measures that must be taken to implement the policy by Council members, staff, volunteers and interns with access to relevant data covered under the Data Protection Acts.

Training and instruction

Bat Conservation Ireland commits to providing or organising ongoing training or instruction to council members, staff, volunteers and interns to facilitate implementation of these policies and procedures.

Evaluation and review

Constructive feedback on this document is always welcome. It should be given to the Administration Manager who will ensure that the Council considers it. The document will be reviewed in full consultation with relevant stakeholders on a regular basis, or as frequently as needed if circumstances change.

Data protection principles

The following principles guide the policy and procedures under which Bat Conservation Ireland deals with personal data:

- Obtain and process the information fairly;
- Obtained and kept only for one or more specified explicit, and lawful purposes;
- Process it only in ways compatible with the purpose for which it was initially given, and shall not be processed in a manner incompatible with these purposes;
- Keep it safe and secure;
- Keep it accurate, complete and kept up-to-date;
- Ensure that it is adequate, relevant and not excessive;
- Retain it no longer than is necessary for the specified purpose(s);
- Give a copy of his/her personal data to any individual, on request;
- Controlled with appropriate security measures

Collection of information

Personal information is normally obtained directly from the individual concerned. In certain circumstances, it will be necessary to obtain information from third parties (for example, references from previous employers or medical information from doctors). If relevant to the nature of the work, Bat Conservation Ireland may make an application to the Garda Vetting Unit for the vetting of Council members, staff, volunteers or interns carrying out appropriate work on behalf of Bat Conservation Ireland.

Use of information

Data controller and data processor

Bat Conservation Ireland uses personal information in two ways:

- As a **data controller** - The legal entity responsible for the acquisition, processing and use of the personal data. In the context of this policy; Bat Conservation Ireland is the data controller. This data relates to current and former council members, employees, volunteers, intern, service users, members and supporters, for various administrative and business purposes, as required to carry out the business of Bat Conservation Ireland;
- As a **data processor** – A person or entity who processes personal data on behalf of Bat Conservation Ireland on the basis of a formal, written contract, but who is not an employee of Bat Conservation Ireland, such as for third party engaged to process payroll on behalf of Bat Conservation Ireland or to process membership payments or donations.

Purposes

Specifically, Bat Conservation Ireland collects and uses information for the following purposes, this list is not exhaustive:

- Human resource management
- Volunteer management
- Payroll
- Fundraising
- Dealing with queries from the general public
- Membership processing and management
- Bat Monitoring

Right to opt-out

Bat Conservation Ireland will inform individuals that information is being collected and used for these purposes prior to doing so. Individuals have the right to object to any specific type of data processing. Where such objection is justified, Bat Conservation Ireland will cease processing the information unless it has a legitimate business interest that prevents this.

Storage of information

Bat Conservation Ireland shall take all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of all personal information and prevent unauthorised access. Security and safety measures will be reviewed from time to time. The organisation will ensure that only authorised Council members or staff have access to an employee's staff file. It may be necessary to store certain other personal data outside the HR department e.g. salary details will be stored by the payroll processing company. The Employee's Manager or supervisor may have access to certain personal data where necessary. Bat Conservation Ireland has appropriate security measures in place to protect against unauthorised access (please refer to our ICT Policy).

Bat Conservation Ireland processes certain data relevant to the nature of the Employment. Bat Conservation Ireland will ensure that personal data will be processed in accordance with the principles of data protection, as described in the Data Protection Acts, 1988, 2003 and 2018. Personal data is normally obtained directly from the Employee concerned. In certain circumstances, it will, however, be necessary to obtain data from third parties e.g. references from previous Employers.

Changes in personal details

Employees are responsible for ensuring that they inform the HR department of any changes in their personal details e.g. change of address. Bat Conservation Ireland will endeavour to ensure personal data held by is up to date and accurate.

Bat Conservation Ireland is under a legal obligation to keep certain data for a specified period of time. In addition, the organisation will need to keep staff data for a period of time in order to protect its legitimate interests.

Disclosure of information

Personal information held relating to individuals will only be processed for the agreed purposes and will not be disclosed to third parties except where required or authorised by law or with the agreement of the individual. When necessary, prior consent for disclosure will be obtained.

Retention of information

Generally, information will be kept no longer than necessary. Specifically, the following rules apply for personal details relating to employees:

Deletion of Information

Data subjects have the right to request that information held on you by the organisation to be deleted under the following circumstances:

- Where personal data held is no longer necessary in relation to the purpose for which it was collected or processed;

- Where consent is withdrawn to the processing of data and there is no other lawful basis for processing of that data;
- Where objection is made to the processing of data and there is no overriding legitimate grounds for continuing the processing of such data;
- Where objection is made to the processing of data relating to the data subject and their personal data is being processed for direct marketing purposes;
- Where personal data has been unlawfully processed;
- Where personal data has to be erased in order to comply with a legal obligation;
- Where personal data has been collected in relation to the offer of information society services.

Access Requests

Bat Conservation Ireland will process all data access requests it received, whether or not personal data on an individual is being held. Where data is held on an individual, a copy of data requested and the purposes for which it is being processed will be furnished to the data requester. Where data is not being held or processed, this information will be relayed to the requester.

Bat Conservation Ireland staff will ensure that such requests are forwarded to the Data Protection Officer in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 40 calendar days from receipt of the request. Please see Appendix 1 for sample access request form.

Compliance

Bat Conservation Ireland is committed to adhering to all legislation relating to data protection.

Appendix 1

Sample Subject Access Request Form: Request for a copy of Personal Data

Important: a photocopy of your proof of identity (e.g. passport or driver's licence) and a photocopy of proof of address (e.g. utility bill) must accompany this Access Request Form (see Note below).

Section A - please complete this section

Full Name:

Postal address:

*Telephone/e-mail:

(include area code)

*As we may need to contact you to discuss your Access Request

Section B - please complete this section

I, [insert name] wish to have access to data that I believe Bat Conservation Ireland retains on me as outlined below (please include the name of service(s) and anything relevant to your access request)

Signed.....Date.....

Please return this form to the Administrative Manager at: admin@batconservationireland.org

Note: we require proof of the applicant's identity and address to ensure that the person making this access request is acting legitimately