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# DATA PROTECTION STATEMENT AND POLICY

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St Agnes' Community Centre for Music and the Arts

OCTOBER 2023



St Agnes'  
**CCMA**

Community Center for Music and the Arts  
Ionad Pobail do Cheol agus na hEalaíona

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Version	Changes	Date
1.0		April 2020
1.1	BOD meeting	October 2023
1.2		
1.3		
1.4		

# St. Agnes' CCMA Data Protection Statement and Policy

## St. Agnes' CCMA Data Protection Officer

Officer: Hilda Milner, General Manager is appointed to ensure your data is protected under GDPR regulations

## Privacy Notice - Introduction

The purpose of this document is to provide a concise policy regarding the data protection and GDP Regulations/obligations of St. Agnes' Community Centre for Music and the Arts (CCMA).

**St. Agnes' CCMA** gathers and processes your personal information in accordance with the relevant Data Protection Regulation and law.

This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

**St Agnes' CCMA** registered office address:

Behind Scoil Úna Naofa, Armagh Road, Crumlin, Dublin, Ireland, D12Y8P8.

It is registered on the Data Protection Commissioner's register and the Data Protection Officer may be contacted at [ccmahilda@gmail.com](mailto:ccmahilda@gmail.com)

## Information That We Collect

**St Agnes' CCMA** processes personal information to meet our administrative, legal, statutory and contractual obligations and to provide you with our services and support.

**St Agnes' CCMA** will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

The personal data that the CCMA collects relating to different categories of people engaging with St. Agnes' CCMA is listed from page 4:

## How We Use Your Personal Data (Legal Basis for Processing)

**St Agnes' CCMA** takes your privacy very seriously and will never disclose, share or sell your data without your consent or unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice.

Where you have consented to us providing you with updates on events, promotional offers and marketing, you are free to withdraw consent at any time.

The purposes and reasons for processing your personal data are detailed below: –

**St Agnes' CCMA** collect your personal data in the performance of a service

**St Agnes' CCMA** collect and store your personal data as part of our legal obligation for business, accounting and tax purposes

## Your Rights

You have the right to access any personal information that **St Agnes' CCMA** processes about you and to request information about: –

- What personal data we hold about you
  - The purposes of the processing
  - The categories of personal data concerned
  - The recipients to whom the personal data has/will be disclosed
  - How long we intend to store your personal data for
  - If we did not collect the data directly from you, information about the source
- If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If **St Agnes' CCMA** receives a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

## Sharing and Disclosing Your Personal Information

The **St. Agnes' CCMA** does not share or disclose any of your personal information without your consent. Your data will not be disclosed to a third party other than in the event that

- a third party is contracted to St. Agnes' CCMA and operating on its behalf or
- St. Agnes' CCMA is required to do so by law and, the Public Sector Body should be able to identify the specific section of the appropriate Act that requires such disclosure.

## Safeguarding Measures

**St Agnes' CCMA** takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data.

All electronic data is stored in a password protected Information Management System in a password protected computerised system. Measures are in place to prevent a malicious hacker attacks including data ransoms.

All manual data will be kept in a locked filing cabinet in a Smart Locked office (passcode protected).

Data protection and electronic Security Awareness Training for staff

## Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **St Agnes' CCMA**, however, as this information is required for us to provide you with our services, we will not be able to offer some/all of our services without it.

## How Long We Keep Your Data

**St Agnes' CCMA** retains your personal data for as long as necessary to provide you with our services as our client.

**St Agnes' CCMA** is required under **Section 285 of the Companies Act** to keep accounting records for a period of **6 years** after the end of the financial year containing the latest date to which the record, information or return relates.

Data required by revenue from individuals or companies who Donate to the charity under the Charitable Donations Scheme will be kept for **12 months** after the donation containing the latest date to which the record, information or return relates

Employee Data will be kept for statutory **minimum of 3 years**.

Records relating to parental leave will be retained for: **8 years**.

Records relating to accidents will be retained for: **10 years**

Records relating employment permit records will be retained for **5 years**.

Records relating to members personal data will be retained for **no longer than 12 months** after the member has disengaged with the organisation

## Lodging a Complaint

**St Agnes' CCMA** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Data Protection Commissioner, Canal House, Station Road,  
Portarlinton, Co. Laois, Ireland R32 AP23  
+353 (0) 57 8684800  
info@dataprotection.ie

## Changes to our privacy notice

**St Agnes' CCMA** may change this notice from time to time. All changes will be posted and updated here. We advise you to check back here frequently to review the most current version of this notice.

This Statement was last updated on **October 2023**

Signed

## Directors, Board of Management members and governance documents relating to St. Agnes' CCMA

<i>Type of data</i>	<i>Optional or required?</i>	<i>Legal Basis and Time frame</i>
<p>Director Personal Data for CCMA business :</p> <ul style="list-style-type: none"> <li>• Full name, Former Full Name (if any)</li> <li>• Residential address:</li> <li>• Business Occupation</li> <li>• Nationality</li> <li>• Date of Birth</li> <li>• PPSN Number</li> <li>• Other Directorships held: (including previous directorships)</li> <li>• Photo ID (passport or driving licence or other official government identity)</li> <li>• Details of any shares or loans they have with the company or a related company that they own or in which they have an interest; and</li> <li>• Details of any other companies of which they are a director.</li> </ul> <p><b>Governance Documentation :</b></p> <ul style="list-style-type: none"> <li>• Records relating to the appointment of Committee members</li> <li>• Records relating to unsuccessful committee applicants</li> <li>• Register of Appointment as a Committee member</li> <li>• Records of declarations from committee members</li> <li>• Register of Members Interests</li> </ul>	<p><b>Required</b></p> <p><b>Purpose:</b> to comply with Companies Act 2014</p> <p>For verification and audit purposes.</p>	<p>Companies Act 2014</p> <p>Public interest, substantial public interest: the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the St. Agnes' CCMA</p>

- Agendas & Minutes
- Correspondence and Reports considered at Board Meetings
- Attendance Sheets
- Records documenting training & development of Committee members
- General correspondence in relation to elections
- Disciplinary appeals documentation,
- Board's deliberations, other relevant material
- Expenses records and reimbursement records.



## Members under 18. Identity details and registration details

<i>Type of data</i>	<i>Optional or required and Purpose</i>	<i>Legal Basis and Timeframe</i>
Full name Name of parent of guardian Address Telephone of guardian Email number of guardian DOB of member under 18 Attendance Record Payment record	<p><b>Required.</b></p> <p>Without this information, we cannot identify you, or contact you, or enrol you in order to deliver community/educational services to you.</p> <p><b>Purposes:</b> St. Agnes' CCMA processes this personal data in order to contact the student about their course, allocate the student to a particular class/group, to contact parents/guardians:</p> <ul style="list-style-type: none"> <li>• in case of an emergency (ill-health or injury),</li> <li>• to notify you of CCMA closure (e.g. adverse weather),</li> <li>• to notify parents/guardians of any other issues relating to their child's welfare or conduct in CCMA</li> <li>• Other administrative, management and statistical purposes/tasks.</li> </ul>	<p>Consent:</p> <p>You are asked to give your explicit consent to the processing of those personal data.</p> <p>This consent can be withdrawn at any time.</p>
<p><b>Level</b> Beginner Improver Advanced</p> <p>Have you completed RIAM grade exams</p>	<p><b>Optional</b></p> <p>You are not required to submit this personal data to us if you do not wish to do so.</p>	<p>Consent:</p> <p>You are asked to give your explicit consent to the processing of those personal</p>

	<b>Purposes:</b> It assists the CCMA determine which class/level you will participate in	data. This consent can be withdrawn at any time.
Photographs and recorded images of students (including at school events and noting achievements), but excluding CCTV recordings (dealt with above).	<p><b>Optional:</b></p> <p>You are not required to submit this personal data if you do not wish to do so.</p> <p><b>Purposes:</b> From time to time, photos and recorded images will be processed at CCMA events. Photographs, and recorded images of members are taken to celebrate CCMA achievements, compile yearbooks, establish a website, record CCMA events, and to keep a record of the history of the centre/programme. We ask you for your consent to take your photograph (or the photographs of your child, where appropriate) or your consent to any other form of visual or audio recording (e.g. video, audio etc.)</p>	<p>Consent:</p> <p>You are asked to give your explicit consent to the processing of those personal data.</p> <p>This consent can be withdrawn at any time.</p>
Guardian preferences regarding direct marketing contacts (e.g. promotions by email, etc.). If they chose to receive such direct marketing, then we will collect mobile phone numbers and/or email addresses for direct marketing purposes.	<p><b>Optional:</b></p> <p>You are not required to submit this personal data to us if you do not wish to be contacted for direct marketing. Purposes: this is so that we know whether we can contact you for the purposes of direct marketing.</p>	<p>Consent:</p> <p>You can give explicit consent to the processing of your personal data for direct marketing if you wish, but this is purely optional. Where you give consent, that consent can be withdrawn at any time.</p>

## Members Data - over 18

<i>Type of data</i>	<i>Optional or required and Purpose</i>	<i>Legal Basis</i>
<p>Full name</p> <p>Address</p> <p>Telephone</p> <p>Email number</p> <p>Attendance record</p> <p>Payment record</p>	<p><b>Required.</b></p> <p>Without this information, the CCMA cannot identify you, or contact you, or enrol you in order to deliver community/educational services to you.</p> <p><b>Purposes:</b> St. Agnes' CCMA processes personal data to in order to contact you about the programme or allocate the member to a particular class/programme group.</p> <ul style="list-style-type: none"> <li>• to notify you of CCMA closure (e.g. adverse weather conditions),</li> <li>• for other administrative and management tasks</li> <li>• To gather statistics for funding/promotional purposes.</li> </ul>	<p>Consent:</p> <p>You can give explicit consent to the processing of your personal data for direct marketing if you wish, but this is purely optional. Where you give consent, that consent can be withdrawn at any time.</p>
<p>Photographs and recorded images of members (including at events and noting achievements), but excluding CCTV recordings (dealt with above).</p>	<p><b>Optional:</b></p> <p>You are not required to submit this personal data if you do not wish to do so.</p> <p><b>Purposes:</b> From time to time, photos and recorded images will be processed at CCMA events. Photographs, and recorded images of members are taken to celebrate CCMA achievements, compile booklets/ funding proposals, for use on the website, record</p>	<p>Consent:</p> <p>You are asked to give your explicit consent to the processing of those personal data. This consent can be withdrawn at any time.</p>

	<p>CCMA events, and to keep a record of the history of the CCMA Company and for promotional material.</p>	
<p>Member preferences regarding direct marketing contacts (e.g. promotions, information about events, new classes, concerts, etc.). If they chose to receive such direct marketing, then we will collect mobile phone numbers and/or email addresses for direct marketing purposes.</p>	<p><b>Optional:</b> you are not required to submit this personal data to us if you do not wish to be contacted for direct marketing.</p> <p><b>Purposes:</b> this is so that we know whether we can contact you for the purposes of direct marketing.</p>	<p>Consent:</p> <p>You can give explicit consent to the processing of your personal data for direct marketing if you wish, but this is purely optional. Where you give consent, that Consent can be withdrawn at any time.</p>

## Teachers, Community Employment Staff, Volunteers

<i>Type of data</i>	<i>Optional or required and Purpose</i>	<i>Legal Basis</i>
<p>Name</p> <p>Address a</p> <p>contact details</p> <p>emergency contact details</p>	<p><b>Required:</b></p> <p>Without this information, we cannot contact you about employment applications/appointment processes.</p> <p><b>Purpose:</b></p> <ul style="list-style-type: none"> <li>• To contact employees, volunteers and board members.</li> <li>• To issue employment contracts and/or letters of appointment.</li> <li>• To comply with employment law requirements regarding issuance of statement of terms and conditions, adding you to the payroll system etc.</li> <li>• to notify you of CCMA closure (e.g. adverse weather conditions),</li> <li>• for other administrative and management tasks</li> <li>• To gather statistics for funding purposes.</li> </ul>	<p>Terms of Employment (Information) Act, 1994</p> <p>Contract: the processing is necessary for a legal obligation, specifically the obligations imposed on St. Agnes' CCMA as an employer under the Terms of Employment (Information) Act, 1994</p>
<p>Bank Account Number</p>	<p><b>Required</b></p> <p><b>Purpose:</b></p> <p>In order to process wage payments to the tutors and paid staff in a secure way.</p>	<p>The Payment of Wages Act 1991 and the Organisation of Working Time Act. To facilitate payment and issue payslips in the required form. To comply with. For organisational administration, verification</p>

		and dispute resolution purposes, to defend litigation, for accounting and audit purposes.
Attendance	<p><b>Required</b></p> <p><b>Purpose:</b> In order to process correct payment for hours worked.</p>	

Garda vetting and outcome	<p><b>Required</b></p> <p><b>Purpose:</b> To comply with National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 – 2016. This processing is carried out only under the control of official authority (the National Vetting Bureau) and under Irish law</p>	<p>National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 – 2016</p> <p>Explicit Consent: the data subject has given explicit consent to the processing of that personal data.</p> <p>The statutory process for vetting is set down in National Vetting Bureau (Children and Vulnerable Persons) Act 2012 (as amended).</p>
Photographs and recorded images of staff and volunteers	<p><b>Optional:</b> you are not required to submit this personal data to us if you do not wish to do so.</p> <p><b>Purposes:</b> From time to time, photos and recorded images will be processed at school events. Photographs, and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school/centre/programme.</p>	<p>Consent:</p> <p>You are asked to give your explicit consent to the processing of those personal data.</p> <p>This Consent can be withdrawn at any time.</p>
<b>Timeframe</b>	The data will be kept for no more than 12 months after the member has disengaged from the organisation	

		Photographs/Video and Audio recording may be used after the 12 month time frame for the purposes of promoting the organisation.
<b>Storage and Security</b>	<b>Electronic Storage:</b>	All data will be stored on password protected computer and a password protected Information Management System. Measures are in place to prevent a malicious hacker attacks including data ransoms.
	<b>Manual Storage</b>	All data will be stored in locked filing cabinets in a locked office. Access to both will be by authorised personnel only



## Health and Safety for staff, volunteers, board of management and all who engage or enter the CCMA building and surrounding grounds

<i>Type of data</i>	<i>Optional or required and Purpose</i>	<i>Legal Basis</i>
<ul style="list-style-type: none"> <li>• Accident reports, Incident Report, documents re injuries</li> <li>• Forms, notifications to insurance company, and/or HAS</li> <li>• Hazard Report Forms</li> <li>• DSE Display Screen Assessments</li> <li>• Pregnant Employee Assessment Forms</li> <li>• Manual Handling Risk Assessment</li> <li>• Inspection Checklists H&amp;S Head Office &amp; Safety Rep</li> <li>• Internal Audits and Reviews</li> <li>• Fire Drills Log</li> <li>• Accident Statistics</li> <li>• Copies of Safety Training Materials + record of who received training</li> <li>• Safety Inspections (HSA)</li> </ul>	<p><b>Required</b></p> <p><b>Purpose:</b></p> <p>Without this information St. Agnes' CCMA cannot properly comply with its duty to operate a safe environment for members and staff, its duty to identify and mitigate any potential risks, complying with all relevant health and safety legislation, to ensure occupational health and safety.</p>	<p>Safety, Health and Welfare at Work Act 2005 and all the regulations made thereunder (including all relevant Safety Health and Welfare at Work (General Application) Regulations 2007</p> <p>Fire Services Act 1981</p>

## Applicants for employment or voluntary services

<i>Type of data</i>	<i>Optional or required and Purpose</i>	<i>Legal Basis</i>
<ul style="list-style-type: none"> <li>• Personal and contact details Name. Address and contact information</li> <li>Qualifications</li> <li>Previous employers</li> <li>• CVs and applications (including unsolicited)</li> <li>• Selection criteria</li> <li>• Letters of invitation to interview, correspondence relating to outcome (including responses to requests for feedback).</li> <li>• Name , role and contact details of Interview Board</li> <li>• Interview Board Marking Sheet</li> <li>• Interview Board Formal Notes</li> <li>• Database of applications of candidates unsuccessful at interview</li> <li>• Panel Recommendations by Interview Board</li> <li>• Interview Process Assessment Board Report</li> <li>• References</li> </ul>	<p><b>Required:</b></p> <p><b>Purpose:</b> to enable the competition process between competitor applicants and to establish that the applicant has the requisite qualifications, experience and/or other criteria specified for the role.</p>	<p>Employment law legislation, including, but not limited to the Employment Equality Acts (as amended) and the Equal Status Acts (as amended).</p>

## Complainants

<ul style="list-style-type: none"> <li>• Name, address and contact information</li> </ul>	<p><b>Required:</b></p> <p><b>Purpose:</b> to enable the administrator to contact the complainant to update s/he on its progress.</p>	<p><b>Consent:</b></p> <p>You are asked to give your explicit consent to the processing of those personal data.</p>
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Donors who donate under the Charitable Donation Scheme		
<ul style="list-style-type: none"> <li>Name, Address, Telephone number, email and PPSN</li> </ul>	<p><b>Required:</b></p> <p><b>Purpose:</b> to enable Revenue process the tax relief associated with a donation of €250 or more within one financial year from one specific individual.</p>	<p>Taxes Consolidation Act 1997</p>