

Irish Methodist Youth & Children's Department
Skainos Centre
239 Newtownards Road
Belfast BT4 1AF

+44 28 9045 3510
office@imycd.org
imycd.org
@imycd



Data Protection

Data Protection Policy

Irish Methodist Youth & Children's Department

Methodist Church in Ireland
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Introduction

We are so blessed in the Methodist Church to have so many people willing to be involved in youth and children's activities, whether that is through their own local church or IMYC events.

Our aim as a department is to make sure you feel valued, supported and resourced in all you do. To facilitate that we have to gather information to communicate with you, to make events happen and to develop the work. We take seriously the need to keep safe any data we hold on you as a volunteer or employed worker. You will see in this policy how we intend to do that!

If you have any questions about what data we hold on you or what we do with it, please feel free to contact us and you will see how to do that in the policy.

'I thank my God every time I remember you. In all my prayers for all of you, I always pray with joy because of your partnership in the gospel from the first day until now.'
Philippians 1 v 3-5

Wishing you every blessing,

Gillian Gilmore
General Secretary
Irish Methodist Youth & Children's Department



Data Protection Principles

Irish Methodist Youth & Children's Department (IMYC) of the Methodist Church in Ireland complies with the General Data Protection Regulation (GDPR) as implemented in May 2018.

We aim to ensure that, when processing information belonging to individuals, we will use that data **with integrity, appropriately, and sparingly**.

We will endeavour to ensure such data **is accurate, not kept forever, and stored securely**.

Training in data protection is recommended for all our staff and volunteers who store and/or use people's information. We will post this Privacy Notice in our buildings, official publications and on our website, imycd.org. We will review this policy every three years.

Your rights

You have data protection rights that you can exercise over the information you give us.

These rights include: to be informed how your data is being used; **to have access** to the information we hold about you; **to have inaccuracies corrected**; **to have your information erased**; **to object to or restrict** the ways we process your information, and; **data portability** (to receive your digital information in a useful format). There may be some legal restrictions on these rights,

which we will explain as appropriate. If you feel your rights haven't been upheld please contact us in the first instance, or you can communicate with the

Methodist Church in Ireland (Secretary of Conference)
1 Fountainville Avenue,
Belfast BT9 6AN;
+44 28 9032 4554;
secretary@irishmethodist.org

Your data

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or

likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

We may record and process some or all of the following personal information about you:

- Contact details (address, phone numbers, e-mail address)
- Date of birth
- Photographs/video recordings
- Health, medication and dietary requirements information
- Event or mission trip specific information
- Financial information required for transactions

We use this data:

- To enable us to provide a children's and youth ministry for the benefit of MCI as a whole;
- To administer and facilitate participants and volunteers at our events and trips;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of financial transactions);
- To keep you informed about events in the throughout the year, e.g. by sending you occasional notices by post, e-mail, including information about the Methodist Church in Ireland and, should you opt-in, other events in the youth and children's ministry sector
- To share your contact details with the Trustees of the Methodist Church, where this is necessary (for example Safeguarding issues)

Legal bases for processing

Our legal bases for processing your data are 'legitimate interests' (for activities related to the everyday functioning of the department) [GDPR Article 6.1(f)] and 'consent' (for everything else) [Article 6.1(a)]. In a small number of instances, we rely on 'contract' (for example, if we are your employer) and 'legal obligation' (for example, in relation to safeguarding issues).

When using 'legitimate interests' as the legal basis for using the information you have given us we will ensure it is for a **genuine** purpose, **necessary** for the smooth

running of the church family, and **not invasive** to your privacy. For all other purposes we will ask for your positive consent before processing your details.

We are able to process 'special categories of personal data' (such as your health or religious beliefs) in the course of our legitimate activities because we are a not-for-profit body with a religious aim relating to you as a member, former member, or person with whom we have regular contact [Article 9.2(d)].

Sharing your data

Only people appointed to specific roles within the department and/or organising committees (staff, members of organising committees for events) can

access your details, and what they can see is limited to what they need in order to carry out their role.

If you are appointed to such a specific role, we may publish your details in relevant media or share them directly so members and other relevant individuals/ organisations can contact you. This will cease when you step down from the role.

We occasionally post photographs and/or video taken at our events on our website (*imycd.org*) and/or other online platforms (*facebook, twitter, Instagram, youtube, vimeo*).

We will not share your information with any other third parties without your permission unless we have a legal obligation to do so. However, we may need to share your details within the Methodist Church in Ireland, as follows:

- To comply with our Safeguarding policy when you volunteer with children and vulnerable adults.
- If your role within the work of the department means you need to receive specific information related to that role.

Security and retention

We use Microsoft Office 365 cloud services for digital files, which have integrated appropriate security measures to keep your data safe, including instances where their servers are located outside of the EEA.

To prevent unauthorised disclosure of your information, our paper-based records are kept in a locked and secured office, in a locked fireproof cabinet when not in use. Electronic and portable memory devices

are protected by passwords or equivalent security measures. Membership software and digital documents containing personal data are either encrypted or password-protected.

We will remove your information from our systems up to three years after your last personal contact with us (except for specific cases, such as Safeguarding). For full details, please see our attached Retention Policy.

Transferring Personal Data Outside of the EEA

We may transfer any personal data we hold, with your explicit consent, to a country outside the European Economic Area ('EEA') or to an international organisation, provided that one of the following conditions applies:

- The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.
- The data subject has given his/her consent.
- The transfer is necessary for one of the reasons set out in the Act, including the performance of a

contract between us and the data subject, or to protect the vital interests of the data subject.

- The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

Retention policy

IMYC seeks to only hold data for as long as is necessary and relevant and is committed to deleting documentation that does not need to be further retained. Relevant documentation, as mentioned in this policy, will be retained for longer periods in accordance

Events

All events related data will be retained for 2 years. Photographs/videos, as well as general attendance records will be archived.

Employed Youth & Children's Ministry workers

All related data will be retained for as long as workers are in employment. The name, church of employment and job role will be archived for historical purposes.

Team On Mission

All data relating to applications, interviews, appraisals and church applications will be held for 6 years. Photographs/videos as well as contact details of past team members will be archived.

Mission Trips

All data relating to Mission trips will be retained for 3 years. Photographs/videos, as well as names will be archived for historical purposes.

with stipulations set by IMYC, as detailed below. Some data, such as photographs/videos/live streams and historical information, will be archived indefinitely and can be removed upon request.

District Volunteers

All data relating to District Volunteers will be retained as long as they are in role.

Resources ordered through IMYC

All data relating to orders for resources through IMYC will be retained for 3 years.

Safeguarding

All data relating to designated persons is retained for 4 years and any data relating to Safeguarding disclosures and issues is retained indefinitely.

Accident Forms

All accident forms will be kept indefinitely.

Employees Data

All data relating to employees of IMYC is regulated by the Methodist Church In Ireland Data Protection Policy for Employees.

Subject Access Request

You have the right to ensure our use of your data is lawful, and that the data we hold is accurate. If you would like to access the data we process about you, please write to us at:

Gillian Gilmore, General Secretary

IMYC, 239 Newtownards Road, Belfast, BT4 1AF
+44 28 9045 3510
E-mail: office@imycd.org

In order to locate the information you are requesting and to ensure proof of your identity, please send us:

- Your name (including any names by which you used to be known) and Date of Birth
- Address (incl postcode), e-mail address(es), telephone number(s)
- **Two** pieces of identification that between them clearly show your name, date of birth and current address (eg passport, photocard driving license, birth certificate, recent bank statement/utility bill)

In response, and within one month at the latest, we will send to you:

- The personal data we hold on record for you
- The types of processing we do with your data
- The people/groups with whom your data will have been shared (or will be in the future)
- Our intentions regarding how long we might store your data
- OR our reasons for *not* providing your data
- We will not charge for this service unless you make multiple requests within a short space of time.

Further Information

You can learn about Data Protection principles, your rights, and more – including making a complaint about our handling of your data – from the Information Commissioner’s Office (ICO) in Northern Ireland [visit www.ico.org.uk, call 0303 123 1113 or write to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF]

The Data Protection Commissioner (DPC) in the Republic of Ireland [visit www.dataprotection.ie, call (0761) 104 800 or write to The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois R32 AP23]. Guidance for Methodist churches is available at www.irishmethodist.org/data-protection-resources [short link: <http://bit.ly/DPresources>]

Breach Notification Policy

IMYC is committed to complying with data protection legislation and will take appropriate technical and organisational measures to guard against unauthorised or unlawful processing and against accidental loss or destruction of or damage to personal data. However, if

a data security breach occurs, it is important to manage and respond to it effectively. A data security breach covers more than the simple misappropriation of data and may occur through incidents such as:

- **Loss or theft of data or equipment**
- **People gaining inappropriate access**
- **A deliberate attack on systems**
- **Equipment failure**
- **Human error**
- **Catastrophic events (for example, fire or flood)**
- **Malicious acts such as hacking, viruses or deception**

Immediate Action

If such an incident occurs it is imperative that we act immediately. The following steps should be taken:

1. Inform the designated Data Protection Officer on 028 9045 3510, who will then inform the Secretary of Conference on (028) 9032 4554 – both actions should be taken **immediately, by telephone;**
2. An initial investigation will be undertaken to determine the nature and cause of the breach; the extent and nature of harm that has or could arise from the breach; and any remedial action that can prevent any or further harm.

If there is no risk of harm then no further action is required (for example if papers are temporarily lost due to being incorrectly filed but are then promptly found and no disclosure has occurred or harm likely to occur).

If there is considered to be a risk of harm then:

1. The appropriate Commissioner must be informed within 72 hours of the discovery [Information Commissioner's Office, (if based in the UK), or the Data Protection Commissioner's Office, (if based in the RoI). If we do not have all of the information by then a report should be made within the 72 hours on the basis of what is known while investigations continue: see page 4 for contact details.
2. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we must also inform those individuals without undue delay.
3. If necessary a number of third parties will be informed which may include:
 - The Methodist Church in Ireland Press Officer
 - Methodist Insurance;
 - The police/guards;
 - The Circuit's solicitors.
4. Following notification we will continue to liaise and cooperate with ICO/DPC.
5. All reasonable steps to mitigate the damage arising from the breach will be taken.

Follow-up

A record of all data protection breaches will be maintained regardless of whether or not notification is required. Detailed records of the investigation should be maintained as well. Following a breach if necessary it must be considered whether any of the below is required:

- Disciplinary action;
- Legal action;
- Internal review of security procedures.

A number of pro forma documents have been prepared which may be of use. Please note that, where possible, legal advice should always be sought in the case of a data breach prior to sending these correspondences.

Appendix A contains a template letter which can be sent to a data subject on discovery of a data breach which is likely to result in a high risk of harm.

Appendix B contains a template letter informing the ICO/DPC upon a data breach for which there is a risk of harm.

Appendix A

Breach Notification - Letter to Data Subject

Data Protection Officer
IMYC
239 Newtownards Rd,
Belfast, BT4 1AF

DATE

Reference: PERSONAL DATA BREACH NOTIFICATION

Dear Name,

We are sorry to inform you of a breach of security that has resulted in the [loss OR unauthorised disclosure OR destruction OR corruption] of your personal data. The breach was discovered on DATE and is likely to have taken place on DATE.

As a result of our investigation of the breach, we have concluded that the breach affects the following types of information: [TYPES OF INFORMATION. FOR EXAMPLE, FINANCIAL, SENSITIVE PERSONAL DATA]. The information has been [accidentally or unlawfully destroyed OR lost OR altered OR disclosed without authorisation OR accessed by [[Name or Description of Organisation] OR an unauthorised person]].

The breach occurred under the following circumstances and for the following reasons:

[CIRCUMSTANCES].

[REASONS].

We have taken the following steps to mitigate any adverse effects of the breach:

[MEASURES].

We recommend that you take the following measures to mitigate possible adverse effects of the breach:

[MEASURES].

[We informed the Information Commissioner's Office/Data Protection Commissioner's Office of the breach on [DATE]].

You can obtain more information about the breach from us at:
Circuit Name, Circuit Superintendent/Appointed Person, Address, E-mail address, Phone number.
We apologise for any inconvenience this breach may cause you.
Yours sincerely,

[NAME OF SENDER – printed under signature]

For and on behalf of Name Circuit, Methodist Church in Ireland

Appendix B

Breach Notification - Letter to ICO/DPC

Dear Sir/Madam,

I am writing to notify you of a breach of security that resulted in the [loss OR unauthorised disclosure OR corruption OR destruction] of personal data. We consider this to be a serious data security breach.

[We have investigated the breach by [DETAILS OF HOW THE BREACH WAS INVESTIGATED] and provide you with the following information.]

[We are in the process of investigating the breach and we anticipate completing our investigation by [DATE], when we will provide you with the further information required. We can provide you with the following details at this stage [PROVIDE ALL THAT IS KNOWN].]

Name IMYC as the data controller in respect of the data breach.

The breach was discovered on DATE and is likely to have taken place on DATE.

The information has been [accidentally or unlawfully destroyed OR lost OR altered OR disclosed without authorisation OR accessed by [[Name or Description of Organisation] OR an unauthorised person]].

The breach occurred under the following circumstances and for the following reasons:

[CIRCUMSTANCES].

[REASONS].

We had the following measures in place to prevent an incident of this nature occurring:

[MEASURES].

We enclose our Data Protection Policy, which was implemented on DATE.

The breach affects the following types of information:

[TYPES OF INFORMATION, FOR EXAMPLE, FINANCIAL OR SENSITIVE PERSONAL DATA AND DETAILS OF THE EXTENT].

It is likely that the breach affects around NUMBER data subjects.

[We have [not] informed the individuals affected by the breach because [REASONS FOR DECISION] OR The individuals are [aware OR unaware] that the incident has occurred].

The breach may have the following consequences and adverse effects on the affected data subjects:

[CONSEQUENCES].

[ADVERSE EFFECTS].

We have [received [NUMBER] of complaints OR not received any complaints] from the affected individuals.

We [have taken OR propose to take] the following measures to address the breach and to minimise and mitigate its effects on the affected individuals:

[MEASURES].

The information has [not] been recovered [and the details are as follows:

[DETAILS OF HOW AND WHEN IT WAS RECOVERED]].

We have also taken the following steps to prevent future occurrences of the breach:

[REMEDIAL ACTION TAKEN].

The facts surrounding the breach, the effects of that breach and the remedial action taken have been recorded in a data breach inventory maintained by the General Secretary.

We provide staff/volunteers/leaders with training on the requirements of data protection legislation. We confirm that training on the requirements under the data protection legislation is mandatory for all staff/volunteers/leaders [and that the people involved in this incident received training on [DATE]].

We have [not] informed the police about this data breach [and the details are as follows: [DETAILS AND NAME OF POLICE FORCE].

There has [not] been [any] media coverage [and the details are as follows: [DETAILS OF MEDIA COVERAGE].

In addition, we consider that the following information would be of interest to you: [DETAILS].

If you require any further information about the breach, please contact:

Gillian Gilmore, General Secretary

IMYC, 239 Newtownards Road, Belfast, BT4 1AF

+44 28 9045 3510

E-mail: office@imycd.org

[NAME OF SENDER – printed under signature]

For and on behalf of IMYC, Methodist Church in Ireland