



NORTHSTAR

Family Support Project

Data Protection Policy

Date of Approval	June 2026
Name of Chairperson/Authorised Officer	Joy Slattery
Review Date	June 2029

Purpose

Northstar Family Support Project is committed to protecting the personal data of participants, volunteers, donors, employees, and Board members. This policy outlines how we collect, use, store, and protect personal data in compliance with:

- **General Data Protection Regulation (EU GDPR)**
- **Data Protection Act 2018 (Ireland)**

Scope

This policy applies to:

- Participants
- Staff and volunteers
- Board members
- Contractors acting on behalf of the charity

It covers all personal data processed by the organisation in both digital and paper formats.

Key Definitions

- **Personal Data:** Any information relating to an identifiable individual (e.g. name, email, phone number)
- **Sensitive Personal Data** (See **Appendix 1**)
- **Processing:** Any use of data (e.g. collecting, storing, sharing)
- **Data Subject:** The individual whose data is processed

Data Protection Principles

We comply with the GDPR principles:

- **Lawfulness, Fairness, and Transparency:** Data must be processed legally, fairly, and in a way the person expects. Clear, accessible privacy notices must explain exactly how data is used. (See **Appendix 2 – Privacy Statement**)
- **Purpose Limitation:** Data must be collected for specific, explicit, and legitimate reasons. It cannot be used for new purposes that are incompatible with the original collection
- **Data Minimisation:** Only collect the personal data that is strictly necessary for the purpose
- **Accuracy:** Data must be accurate and kept up to date. Inaccurate or outdated information must be corrected or deleted without delay
- **Storage Limitation:** Do not keep personal data longer than necessary
- **Integrity and Confidentiality:** Data must be protected using appropriate security measures (such as encryption and access controls) to guard against unauthorised access, loss, or destruction
- **Accountability:** Organisations are responsible for complying with all the above principles. They must be able to demonstrate this compliance through documentation and policies

Lawful Bases for Processing

We process personal data under one or more of the following legal bases:

- Consent e.g. WhatsApp Groups
- Contract e.g. service provision
- Legal obligation e.g. regulatory reporting
- Legitimate interests e.g. fundraising promotion

Types of Data We Collect

We may collect:

- Contact details (name, address, email, phone)
- Participant information
- Financial/payment details (where necessary)
- Volunteer records
- Donor information

We **avoid collecting sensitive data** unless strictly necessary and with appropriate safeguards.

How We Use Personal Data

We use data for:

- Service delivery
- Managing staff and volunteers
- Communicating with stakeholders
- Fundraising activities
- Legal and financial compliance

Data Sharing

We only share data where necessary with:

- Other Service providers (limited information for referral purposes)
- Regulatory bodies (if legally required)
- Funders (anonymised)

Data Storage & Security

We implement security measures such as:

- Password protection and encryption - Multi-factor authentication is required to access the database (Salesforce) used to securely store all personal data
- Restricted access to data - Staff members only access the data they require to perform their duties
- Secure paper filing systems - Limited data is gathered and stored in paper format. Group Attendance is recorded in Confidential Sign-In Sheets where names are not visible to others. These records are shredded after the data is recorded on Salesforce.
- Regular backups ensure a high level of security and protection

Personal data breaches will be reported to the **Data Protection Commission (DPC)**.

Data Retention

We retain data only as long as necessary. Typical retention periods:

- Participants: 7 years
- Donor records: 6 years (for financial compliance)
- Employee records: up to 7 years after employment ends
- Volunteer records: 6 years after last contact

Rights of Individuals

Individuals have the right to:

- Access their data
- Correct inaccurate data
- Request deletion ("right to be forgotten")
- Restrict processing
- Object to processing
- Data portability

Requests should be made to info@northstarproject.ie

We respond within **one month**.

Consent

- Consent must be freely given, specific, and informed
- Individuals can withdraw consent at any time

Data Breaches

All breaches must be reported immediately to the Coordinator who will:

- Assess risk
- Notify the Data Protection Commission within **72 hours** if required
- Inform affected individuals where necessary

Roles and Responsibilities

Data Protection Lead:

The Coordinator is responsible for

- Ensuring compliance
- Handling data requests
- Managing breaches

All staff/volunteers must:

- Follow this policy
- Keep data secure
- Report concerns immediately

Training and Awareness

We provide basic data protection training to all staff and volunteers.

Policy Review

This policy is reviewed every three years or when legal or regulatory changes require it

Appendix 1

Special Category Data

Certain types of sensitive personal data are subject to additional protection under the GDPR. These are listed under Article 9 of the GDPR as “special categories” of personal data. The special categories are:

1. Personal data revealing racial or ethnic origin.
2. Political opinions.
3. Religious or philosophical beliefs.
4. Trade union membership.
5. Genetic data and biometric data processed for the purpose of uniquely identifying a natural person.
6. Data concerning health.
7. Data concerning a natural person’s sex life or sexual orientation.

Processing of these special categories is prohibited, except in limited circumstances set out in Article 9 of the GDPR.

Appendix 2

Data Protection Privacy Statement

Data protection is the practice of safeguarding people's privacy rights when their personal information is collected, processed, and stored. This statement explains how we collect information about you, how we use it, and how you can interact with us about it. Any personal information you provide will be subject to the highest standards of security and confidentiality, and strictly compliant with the Data Protection Act 2018 and General Data Protection Regulations (GDPR).

What information do we collect about you?

When you email or phone us, we collect personally identifiable information about you which can include your

- name
- postal address
- phone number
- email address.

We also record broad information to

- Confirm you contacted the right service for your needs
- Acknowledge the supports we suggest to you to meet your needs
- Explain any decision to refer you another service
- Provide you with information on another service
- Ensure the supports we offer you are helpful and making a positive difference

While personal data also includes photos and videos, **we do not collect data in this way.** If you attend a Northstar Family Support Project event, we will always seek your consent before a photo is taken for the purpose of acknowledging the event. You have the right to refuse. Crowd shots or "long shots" where no one is identifiable do not require consent.

How will your information be used?

We will contact you using your contact details for the following purposes:

- To register your interest in using our service and communicate with you about our services
- To respond to your queries and/or information requests
- To respond to your feedback or a complaint you may make
- To help us evaluate our services if you consent to it

What is our legal basis for processing your personal data?

We will only process your personal data:

- With your Consent
- Where it is in Northstar's legitimate interest to:
 - Provide you with information about our services where you have consented to contact

- Follow up with you on your queries
- Where we must comply with a legal obligation
- Where it is necessary for the performance of a contract

Who receives your information?

- Northstar will only share necessary information about you with third parties with your consent and for stated reasons e.g. referral to organisations to allow them to contact you
- We will not sell, trade or swap your personal details with third parties
- We will only disclose your personal data if we are required to comply with legislation, regulation, court order or another statutory requirement.

How long will your personal data be held?

We will keep your personal information for 7 years. This is in keeping with requirements in relation to data on health and related services.

Security of your information

Northstar holds your personal data on a secure server. We take all reasonable steps (including appropriate technical and organisational measures) to protect your personal data from loss, misuse, alteration or destruction, and to prevent any unauthorised or unlawful disclosure or processing.

What are your rights?

Under data protection legislation you have the right to:

- access the personal data we hold about you
- object to the processing of your personal data
- complain about processing of your data carried out by us
- have your personal data updated or amended
- have your data deleted where there is no legal requirement to keep it
- withdraw your consent in relation to holding and processing your data

We respect your right to privacy.