



Howth Sutton Autism Friendly Community General Data Protection Regulation and Privacy Policy

1. Purpose

This policy outlines how Howth Sutton Autism Friendly Community (HSAFC) collects, uses, stores, and protects personal data in accordance with the General Data Protection Regulation (GDPR).

2. Scope

This policy applies to all personal data handled by the organisation, including participation, communication, and administration. It includes data collected from members, volunteers, participants, staff, or the public, across both digital and physical formats.

Data Protection Contact & Data Protection Controller

The data protection contact & data protection controller for HSAFC is our secretary under the governance of our committee. The committee is responsible for determining the purpose and means of processing personal data. The committee must ensure that all sub committees adhere to this Policy and ensure that all data obligations are met by the committee.

Subcommittees and Data Handling

All subcommittees operate under the authority of the data controller. They must:

- Follow this policy in full
- Collect only the personal data necessary for their specific role / activity
- Store all data securely and limit access to individuals with a legitimate need only
- Where appropriate, forward personal data to the central data controller
- Delete or destroy temporary or local records once they are no longer needed

3. What Data We Collect

HSAFC collects personal data from individuals in different ways depending on their relationship with the organisation. This may include individuals who have chosen to become members of HSAFC, as well as participants, parents, guardians, volunteers or visitors who engage in HSAFC activities or events without becoming members. We collect only the

personal data necessary to support participation, ensure safety, communicate effectively and meet our legal and organisational responsibilities.

Depending on the nature of an individual's involvement with HSAFC, we may collect the following categories of personal data:

- Contact details (e.g. name, email, phone number, address)
- Records of membership and/or participation (e.g. event sign-up, attendance, volunteer involvement)
- Photos or media (only with explicit consent)
- Emergency contact information
- Communication or support needs (e.g. sensory needs)
- Information provided for reasonable accommodations (e.g. inclusion supports, routines)

We collect only the minimum data necessary.

Special Category Data

In order to provide safe, inclusive and accessible activities, HSAFC may collect limited Special Category Data relating to health, disability, communication needs, sensory requirements and accessibility supports where this is necessary to facilitate participation or meet safeguarding obligations.

Such information will be collected only where necessary, processed lawfully and fairly, accessed only by those who require it to carry out their role, and protected with appropriate safeguards in accordance with GDPR and HSAFC's Data Protection and Privacy Policy.

Where HSAFC processes information relating to health, disability, communication or accessibility requirements, it will do so only where there is an appropriate lawful basis under GDPR and where the information is necessary to support participation, inclusion, safeguarding or the delivery of HSAFC activities.

4. Legal Basis for Processing Data

Under GDPR, we process personal data on the following legal bases:

- Consent: for communications, photos, or optional information
- Contract: for participation in our events or services
- Legal obligation: e.g. for safeguarding
- Legitimate interest: to operate our Community efficiently and safely
- Vital interest: in emergencies, to protect someone's wellbeing or life

5. How We Use Personal Data We use data to:

- Contact individuals about community events, volunteering opportunities, or to give updates
- Support safe and inclusive participation (e.g. use of accessibility adjustments)
- Maintain membership and participation records
- Manage volunteers and committees

- Meet legal obligations (e.g. safeguards)

Data Sharing and Service Providers

HSAFC does not sell personal data. Personal data may be shared where necessary with trusted service providers who support the operation of the organisation (such as email, cloud storage or event management systems), or with statutory authorities where required by law or for safeguarding purposes. Any such sharing will be limited to what is necessary and carried out in accordance with GDPR requirements.

6. How We Store and Protect Data

HSAFC takes appropriate technical and organisational measures to protect personal data from unauthorised access, loss, misuse or disclosure.

- Digital records are password protected and stored using electronic systems approved by the Committee from time to time.
- HSAFC seeks to minimise the use of paper records. Where physical documents containing personal information are required, and/or where photos of documents or persons have been taken, they will be held securely by an authorised committee member and securely destroyed when no longer required.
- Access to all personal data is restricted to committee members and volunteers who require it to carry out their role on behalf of HSAFC.
- Committee members and volunteers who process personal data on behalf of HSAFC using personal devices or accounts must take reasonable steps to protect that information. This includes using password-protected devices, limiting access to authorised persons, securely storing any paper records, and deleting personal data and/or photos when no longer required or has been transferred to the organisation's approved records.
- Personal data will be retained only for as long as necessary for the purpose for which it was collected, in accordance with HSAFC's GDPR Policy and applicable legal requirements. Data will be reviewed regularly and securely deleted or destroyed when no longer required.

7. Your Rights

Under GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate/incomplete data
- Request deletion of your data, where legally permissible
- Object to or restrict how your data is used
- Withdraw consent at any time (where applicable)
- Lodge a complaint to the Data Protection Commissioner

8. Children and Vulnerable Adults

HSAFC recognises that additional care is required when collecting, using and protecting personal data relating to children and vulnerable adults participating in its activities.

In handling such information, HSAFC will:

- Collect only the personal data that is necessary for the purpose for which it is required.
- Obtain consent from a parent or guardian where required for children participating in HSAFC activities.
- Respect the rights, dignity and independence of vulnerable adults and, where appropriate, obtain consent directly from the individual or from a person authorised to act on their behalf.
- Process any Special Category Data, including information relating to disability, health, communication or accessibility needs, only where necessary and in accordance with GDPR and HSAFC's safeguarding responsibilities.
- Take appropriate steps to ensure that personal information is stored securely and accessed only by those who require it to carry out their role.
- Where appropriate, use inclusive communication to explain data use and support informed consent.

9. Events and Temporary Data Collection

If we collect personal data for one-off events (e.g. includes accessibility needs, attendance), this data will:

- Be collected with clear explanation and consent
- Only be used for that specific event
- Be deleted or destroyed after the event unless further retention is agreed

10. Data Breaches

If a data breach occurs, we will:

- Assess the potential risk to individuals
- Inform affected individuals
- Report serious breaches to the Data Protection Commissioner within 72 hours
- Keep a record of the breach and how it was corrected

Exceptional Disclosures

In the rare event that personal data is required by law to be shared without consent (e.g. safeguarding concerns), affected individuals will be informed where appropriate, unless doing so would create a risk of harm and/or legal obstruction.

11. Review and Contact

This policy is reviewed annually, or in response to changes in data protection law. For any questions, requests, or concerns about how your data is used, contact:

Data Protection Contact & Data Protection Controller: Gustavo Bernstein 087 1210434

