

**GDPR: Guidelines and Recommended Practices & Procedures  
Units of Comhaltas Ceoltóirí Éireann (CCÉ)**

GDPR, General Data Protection Regulations came into force on May 25 2018. GDPR is designed to more effectively protect the rights of individuals with regard to their personal data, taking into consideration the changes in data collection and internet use since the previous legislation and Data Protection Guidelines in 2003.

In addition to clarifying and expanding the rights of EU citizens to control their personal data, it also places significant new obligations on organisations who control or process that data.

Data – Automated and Manual Data - is information in a form which it can be processed.

- Automated Data; recorded on a computer, or with the intention of putting it on one
- Manual Data: recorded on a relevant filing system (a system of storing information so that it can be referenced by individual criteria), or intended to be put on one.

Data Processing involves basically anything you do with the Data you collect.

Data Protection outlines how the privacy rights of individuals are protected with respect to their personal data.

Personal Data is Information relating to a living individual who can be identified by that information – examples of personal data are: Full Name, Address, Contact Details, Date of Birth (in relation to membership / competition eligibility)

Information where the individual is the central them of the data is regarded as Personal Data.

Data that can be used to inform or affect decisions about an identifiable individual is regarded as Personal Data.

A data subject is a person who is the subject of personal data.

Sensitive Personal Data:

CCÉ units rarely, if ever, have reason to collect or hold Sensitive Personal data.

Sensitive Personal data relates to: Racial or ethnic origin; Religious or other beliefs; Political affiliation or beliefs; Physical or Mental Health; Sexual orientation; Trade Union Membership; Criminal or alleged criminal history.

Eight Data Protection Principles:

1. Obtain and process the information fairly
2. Keep it for only one or more, specified, explicit and lawful purpose
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than it is necessary
8. Give a copy of his/her personal data to an individual on request;

On request a data subject is entitled to:

- A copy of the data you hold about them
- Know why you kept it
- Know who you share it with
- Know the logic behind any automated decisions
- Know where the data came from

**Comhaltas Ceoltóirí Éireann:**

CCÉ is a voluntary membership-based participative organisation and a registered Charity.

CCÉ's membership and unit affiliation process and structure is as follows:

- Individual (Senior / Junior/Family) Membership of a Branch
- Branch Affiliates to County / Region
- County/Region affiliates to Province
- Province affiliates to Ardchomhairle (CEC).

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### **Membership/Data:**

As a membership organisation, personal data comprises the core information required for CCÉ to issue membership cards, and to provide the services and supports implicit in membership. This data is offered freely by the member on their own behalf, and in the case of Parent/Guardian on behalf of their dependant.

Membership from 2018-2019 moving forward will include submitting details on a standard membership form, with specific provisions for Junior members, and confirming in writing explicit consents that are operationally necessary for the purposes of CCÉ delivery of services, internal communications and promotion of CCÉ events etc. Informed and agreed consent is presently understood through the membership process and other existing documentation and practices based on reasonable expectation by the data subject.

Junior members of CCÉ are those aged Under 18 on January 1<sup>st</sup> on the year of registration.

All membership processes in relation to Junior members are considered with regard to CCÉ Child Protection & Safeguarding Policy

This standard membership form will include an active opt-in, in relation to the acquisition of images, audio/visual capture etc by CCÉ for its core operations, and appropriate collecting, storing and use of contact details etc.

Membership cards are issued on an Annual Basis by CCÉ Branches. (Bunreacht CCÉ)

CCÉ membership details are never shared with a Third Party.

Units of CCÉ are encouraged to use the new online CCÉ Membership system form 2018 onwards. This online will have been constructed according to principles of GDPR including Privacy by Design and Appropriate Retention.

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### **Office Holders/Data:**

Branch affiliation for each unit of CCÉ involves the processing of contact details,- e.g. postal address, phone numbers and email addresses - for officers elected to various executive positions- Designated Liaison Persons (DLP's) are appointed. The branch AGM pack core administrative document clearly outlines that officers contact details are used by CCÉ for administrative and other core operational activities.

Units are recommended to use their Comhaltas email address.

CCÉ does not at any level share contact information with third parties. It shares appropriate contact details with regards to operations, internally only.

### **Archival Documentation/Content/Data**

Units of CCÉ may hold personal data that it considers to be of an archival nature. The Unit Meeting Minutes/ records are recommended to include entries to this effect.

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### **Correspondence/Data:**

The consideration of correspondences is a standard agenda item of CCÉ meetings. Written correspondences are considered in the appropriate manner in accordance with Bunreacht/ CCÉ documentation and practices. Incidental inclusion of personal data may occur.

Correspondence containing (incidentally or otherwise) personal data, especially data that could be considered to be sensitive data can be considered on an individual basis.

Some CCÉ units that offer specific educational programmes, may require additional personal data in relation to Junior Members. Such units will make clear processes with regards to this. e.g. a summer camp may have specific medial information pertaining to the child whilst attending the camp.

Units of CCÉ may organise training and other educational / participative courses. This will invariably mean that Personal Data of the attendees needs to be processed and stored for the purposes of the administration of the activity.

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**Communications/Data:**

Comhaltas is an activity-focused, participation-based organisation. Communications and notifications relating to activities are a core part of our operations. Such communications and notifications of CCÉ related events are a core part of unit administration.

Personal data acquired for contacts listings (phone, e-mail, addresses, fax etc) are used only for the specific purposes for which they are required (e.g. notifying parents re junior member Activity etc)

Blind copying (Using Bcc) is recommended practice for group emails.

Group texts are sent to recipients who have opted in to a group messaging service and have given their contact details as a means of receiving group communications.

Unit group emails- digital communications should be sent to contact details who have indicated explicit consent to receive same.

Units of CCÉ are required to ask tutors/mentors/ all CCÉ personnel with regular access to children and vulnerable adults for a copy of their letter confirming their CCÉ Vetting including this CCÉ Vetting number.

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**Photographs/Audio-Visual Data:**

Images/ Audio / Audio Visual recordings should be considered as potentially sensitive data based on the content, context and setting involved.

Photographs of Juniors/Minors/Vulnerable Adults should be considered with regard to CCÉ Child Protection and safeguarding Policy. It is understood that photographs/ Audio-Visual recordings of all individuals are taken with explicit consent and published (posted) in any format with active consent.

Parents / Guardians / Appointed Nominee agree to record performances of groups with agreed explicit consent.

The responsibility of acquiring permission to record, is that of the person intending to record.

The nature and the use of recordings of any competitor / participant at any CCÉ competition / event are the responsibility of the recorder.

Whereas it is understood that photographs of crowds are not considered an invasion of privacy, the recordings are to be mindful of the privacy of others being within the context of a public event.

Those taking group photographs / recordings, usually verbally indicate their intent to do so prior to capturing data, thereby affording individuals the option to opt-out.

Due regard is given by CCÉ Units to Data Protection and Privacy within the unique context of CCÉ's mission and operations; The intergenerational transmission of oral cultural traditions is central to Comhaltas aims, objectives and activities. Recordings of performances (formal or informal) are part of this process and CCÉ's archival remit as are photographs of performers and participants etc. This Data is also used to support CCÉ's broad based Educational & Events Programmes.

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### **Fleadhanna Ceoil & CCÉ Competitions/Data:**

Fleadhanna Cheoil Competitions are a core part of Comhaltas activity.

The process of competition entry requires the submission of personal data required to determine eligibility for the competition in question.

Comhaltas Membership files may need to be accessed by appropriate CCÉ personnel (at inter-Branch/inter-County and Inter-Province level) to assess competitor eligibility for a Fleadh/competition- e.g. Fleadh Competitions are based on residency.

Fleadhanna Ceoil / CCÉ competitions publish a commemorative 'Clár' which includes competitor listings. These listings apply at all various levels through the qualification system, and only the personal data required for the eligibility and processes of the competition are obtained and processed and included.

With reference to perpetual trophies won at Fleadhanna Ceoil, contact information is requested from the competition winner (or Parent or Guardian of winner) for the purposes of returning the trophy for the following years competition and is only held for the 1 year duration of this process. These contact details are held by the relevant unit of Comhaltas for this purpose only and if shared are shared internally within Comhaltas Officers/ Units for the purposes of the perpetual trophy being returned for the subsequent year's competition.

It is understood that Fleadh / Competition results are published and frequently released to the press. The only personal data which is released is that which is entered at source.

Fleadh Cheoil and other CCÉ Competitions/ Events Logistical – Operational Requirements/Data: The smooth running of Fleadhanna Ceoil and other CCÉ Competitions/ Events involves a wide number of personnel – clerks, stewards, venue managers, results office personnel, Trophy Room personnel, etc Contact Details for such personnel are shared for the purpose for organisational, event managements and Health & Safety Procedures.

**Fleadh Cheoil/ CCÉ Competition Adjudication Sheets:** Adjudication Sheets are unique to the competitor and are identified according to the Competitor Listing. Completed adjudication sheets contain comments specific to the competitors' performances.

CCÉ has specific processes with regard to access to these sheets. Completed adjudication sheets need to be reviewed for purposes of accuracy both by competition personnel at the competition venue and personnel in the Fleadh/Competition Results Office. Such access is required for the guaranteed accuracy and authenticity of competition results and is limited to appointed personnel and on a need-to-know basis.

The completed adjudication sheets are brought in a sealed envelope to the results office. On completed review for accuracy in the results office, adjudication sheets are stored in an appropriately secured manner. The careful processing of the completed Adjudication Sheets, including the confidentiality of these sheets is outlined at the Pre-Fleadh / Competition Briefing.

Further access to adjudication sheets is necessary for the copying and sending out of sheet (as per rule quote) Standard practice is that a competitor can only request their own sheet – and a sheet for group competitions is only available to a single nominee who submits the request form for the Adjudication Sheet.

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Access to completed adjudication sheets during this copying/distribution process is on a need's must basis and as with all aspects of completed adjudication sheets.

Copies of completed adjudication sheets at all levels of Fleadhanna Ceoil should be retained by the Unit Secretary for a three-month period after Fleadh Cheoil na hÉireann in that year. (Rule 33 - Rialacha Fleadhanna Ceoil) These sheets should then be destroyed after the retention period. The unit of CCÉ should provide for adequate and secure storage of these sheets.

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### **Website / Social Media /Digital Platforms**

Many CCÉ units use Websites and or social media platforms as part of their PR & Communications strategies.

The publishing of information on any online platform takes these GDPR Guidelines into consideration and general privacy guidelines in to consideration.

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### **Data Retention:**

Only the minimum amount of data for the purpose to which it is sought should be recorded. Data must be correct and up to date – this is understood by nature of a membership organisation. Appropriate measures are taken to ensure personal data in all formats is secure.

Personal data (both hard and soft copy) is stored in a secured fashion and generally handled in a responsible manner.

Personal Data is retained for the purposes of being relevant and only for as long as required for that purpose by the organisation.

Units of CCÉ should consider Data Retention Periods with regard to Data Subject Requests. Content / data that does not relate to a living person is not considered as Personal Data under GDPR. However content/data being retained for historical and archival purposes is retained and considered within the framework of principles of archiving and historical record-keeping.

### **Data Audit:**

Each unit of CCÉ varies in the extent and nature of its activities. CCÉ units will find it useful to identify the various types of personal data that it holds, why it holds it, how it processes and shares this Data and for long it should retain this data. This process to be undertaken within the context and process of developing GDPR awareness and these interim guidelines.

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