

***Cavan CCC Data Protection Policy***  
***Approved 18<sup>th</sup> July 2018 BOM***



**Contents**

DATA PROTECTION POLICY.....4

    Introduction .....4

    Policy Scope .....4

    Data protection risks .....5

    Responsibilities .....6

    General Staff Guidelines.....6

    Data Protection Officer.....7

        Data Collection .....8

        Data Storage .....8

        Data use .....10

Data accuracy .....	11
Data access requests .....	11
Disclosing data for other reasons: .....	11
Data Retention and Erasure .....	12
Data Breach Reporting: .....	12
Providing Information:.....	12
PRIVACY POLICY .....	14
Opening Statement.....	14
Personal Data:.....	14
Why We Collect Your Personal Data?.....	14
Sharing & Disclosure .....	14
Who We May Share Your Personal Information With: .....	15
Protection of Named Service & others and Disclosures for Law Enforcement .....	15
How long we keep your personal data? .....	16
What are your rights?.....	16
Right of Access.....	16
Right to Rectification .....	16
Right to Erasure .....	16
Right to Restrict Processing .....	16
Right to Object.....	17
Right to be informed.....	17
Right to Portability.....	17
DISCLAIMER .....	18

APPENDIX - DATA RETENTION POLICY .....	19
1. Introduction .....	19
2. Who is this policy for? .....	19
3. Retention Rules.....	20
Safeguarding of Data during Retention Period.....	20
Destruction of Data .....	20
Breach, Enforcement and Compliance .....	21
4. Document Disposal.....	22
Destruction Method .....	22
5. Validity and document management .....	23
6. DATA RETENTION SCHEDULE AND DATA DISPOSAL SECTION AND PERSONAL DATA RETENTION .....	23
Data Retention Schedule .....	23
Data Disposal Schedule.....	35
Personal Data Retention.....	36

# DATA PROTECTION POLICY

## Introduction

Cavan County Childcare Committee, in conducting its business, needs to gather and use certain information about individuals. This can include parents, childcare staff and committee members, clients, suppliers, business contacts, employees and other people that we have a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet data protection standards and to comply with GDPR.

This policy aims to ensure that Cavan County Childcare Committee:

- Complies with data protection law and follows good practice
- Protects the rights of staff, clients and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

## Policy Scope

This policy applies to:

- All staff & Committee members of Cavan County Childcare Committee
- All volunteers and students on work experience
- All contractors, suppliers and other people working on behalf of Cavan County Childcare Committee

It applies to all data that the company holds and has access to relating to identifiable individuals and can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Dates of Birth
- PPSN Numbers
- Bank details
- Financial information including social welfare payments as part of CCSP eligibility
- Medical information
- Plus any other information relating to individuals

### Data protection risks

This policy helps to protect Cavan County Childcare Committee from some very real data security risks including:

- Breaches of confidentiality. For instance, information being given out inappropriately

- Failing to offer choice. For instance, all individuals should be free to choose how their personal data is used
- Reputational damage. In case of a data breach, data used for fraud or if hackers gained access to sensitive data

## Responsibilities

Everyone working for or with Cavan County Childcare Committee has some responsibility to ensure that data is collected, stored and handled appropriately. Each staff member must ensure that they handle and process data in line with this policy and data protection principles (see Appendix 1)

## General Staff Guidelines

- Only data needed for your work should be accessed
- Data should not be shared informally and should not be disclosed to unauthorised people
- Management will support staff to understand their responsibilities in regards to the implementation of this policy
- All data should be kept secure by taking sensible precautions
- Strong passwords should be used, passwords should never be shared, desktop computers should not be set to remember passwords
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required it should be deleted and disposed of
- Staff should request help from the manager or data protection officer if they are unsure about any aspect of data protection

The board of directors is ultimately responsible for ensuring that Cavan County Childcare Committee meets its legal obligations

## Data Protection Officer

The Data Protection Officer, Treasa Quigley, is responsible for:

- Informing and advising colleagues and the Committee of their data protection obligations and keeping them aware about data protection responsibilities, risks and issues
- Monitoring the organisation's GDPR compliance and reviewing all data protection procedures and related policies in line with an agreed schedule
- Handling data protection questions from staff and anyone else covered by this policy
- Working with other staff as necessary to ensure initiatives abide by data protection principles and approving any data protection statements attached to communications such as emails and letters
- Dealing with requests from individuals to see the data Cavan County Childcare Committee holds about them (also called "subject access requests")
- Provide advice regarding privacy impact assessments
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data and evaluating third party services used to store or process data (e.g. cloud computing services)
- Addressing any data protection queries from outside of the organisation
- Acting as a point of contact and co-operate with the data protection authority as required

## Responsibilities of IT services contracted by Cavan County Childcare Committee

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Providing CCCC with verification statements and information in regards to the computer systems provided
- Performing regular checks and scans to ensure security hardware and software is functioning properly

## Data Collection

We ensure that data is collected lawfully, fairly and transparent by considering that consent is freely given, that there are opportunities offered to withdraw consent and to correct data held.

Staff of Cavan County Childcare Committee will carry out a data inventory on a regular basis to establish that all data is held in accordance with GDPR

## Data Storage

Data stored **on paper** should be kept in a secure place in locked filing cabinet where unauthorised people cannot see it. This also applies to data usually stored electronically that has been printed:

- When not required the paper or files should be kept in a locked drawer or filing cabinet
- Staff must ensure that paper or printouts are not left where unauthorised people could see them, e.g. on the printer
- Data printouts should be shredded and disposed of securely when no longer required

Data **stored electronically** must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared only with Coordinator(in the event of sickness or annual leave)
- Data stored on removable media (CD, DVD, USB) should be kept locked away securely when not being used
- Data should only be stored on or uploaded to designated drives and servers
- Servers containing personal data should be sited in a secure location away from public office space
- Data should be backed up frequently, backups should be tested regularly in line with backup procedures
- Data should never be saved directly to laptops or mobile devices like tablets or smart phones
- All servers and computers containing data should be protected by approved security software and a firewall

Physical Security of the premises:

- alarm system on the premises
- offices locked
- locked filing cabinets
- online data management systems are password protected
- files are stored in appropriate places
- shredder used to dispose of documents and printed data

Access Control, data Security:

- We are particularly aware that as part of our work we have access to children's data
- Accessing computers, accessing portals (PIP safe & secure platform), access needs of internal staff and is it clearly linked to the job duties and requirements of the post.
- Staff desktop cannot be used for processing provider applications or reports – providers must arrive with their own laptop and if wifi is needed they need to do so via a hotspot on their mobile phone.
- Downloading can only be work related materials and research.
- Work related documents, facebook, twitter should only be downloaded or accessed from work related equipment
- USB should not be used to download work related documents

#### Data use

It is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data staff should ensure that computers screens are always locked when left unattended or set to password activated sleep mode after 5 minutes
- Computers should be turned off at night or if working from home then have sleep mode activated on desktop screen
- Personal data should not be shared informally. It should never be sent by email, as this form of communication is not secure
- Precautions need to be put in place before transferring data electronically (i.e. encryption)
- Staff should not save copies of personal data to their own computers or devices, always access the central copy of any data instead
- Personal data should never be transferred outside of the European Economic Area

### Data accuracy

Cavan County Childcare Committee will take reasonable and proportionate steps to ensure data is kept accurate and up to date. This responsibility is shared by all staff.

- Data will be held in as few places as necessary, staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated (i.e. as soon as they become aware of a change or an inaccuracy, checking details with clients routinely)
- Cavan County Childcare Committee aims to make it easy for data subjects to update the information we hold about them, this is facilitated by regular reviews and ongoing updates as requested by email or phone

### Data access requests

All individuals who are the subject of personal data held by Cavan County Childcare Committee are entitled to ask what information is held about them and why, find out how to gain access to it, be informed how to keep it up to date and have information on how Cavan County Childcare Committee is meeting its data protection obligations. Any such request will be dealt with in line with GDPR aiming for a response time of one month

### Disclosing data for other reasons:

In certain circumstances (i.e. Child Protection and Welfare) the Data Protection Act allows personal data to be disclosed to relevant agencies in an appropriate manner without the consent of the data subject.

## Data Retention and Erasure

Please see appendix for our detailed [DATA RETENTION POLICY](#)

### Data Breach Reporting:

Breaches must be reported to the relevant supervisory authority within 72 hours of discovering the breach, unless the breach is unlikely to result in a risk to the rights of data subjects. Data subjects will be notified if the breach results in “high risk” to them. Records of all breaches will be kept by data controllers and processors.

### Providing Information:

Cavan County Childcare Committee aims to ensure that individuals are aware that their data is being processed and that they understand how the data is being used and how to exercise their rights

### Privacy Statement:

### Privacy Impact Assessments

### Data Inventory:

Type of Data collected in the course of the work at Cavan County Childcare Committee:

- Provider/service contact information & details
- Parent/child contact information & details
- Interagency contacts & details

- Training data & contact details of those attending training
- Complaints data
- Employee contact data and details / supervisory reports & appraisal
- Recruitment & applicant data
- Data Processing – Data Mapping throughout the organisation

Each CCCC staff member will process data relevant to their Job role using various systems

## PRIVACY POLICY

### PRIVACY POLICY for Early Years Providers

#### Opening Statement

We respect your privacy and your rights to control your personal data. We will be clear about what data we collect and why we collect it. This privacy statement explains the personal information we collect from you, why we collect it, how we will use it and how we protect it.

Cavan County Childcare Committee collects personal data about you in order to deliver local programmes and actions on behalf of DCYA. By agreeing to this statement CCCC will hold your personal data as described in this Statement.

Cavan County Childcare Committee is a Controller of the personal data you (the data subject) provide us. We may collect the following types of personal data from you, about you depending on programme requirements:

**Personal Data:** date of birth, your address, email address, telephone number, PPS number, social welfare status, bank account details, DCYA reference number, Tusla reference number, and any other relevant data required.

#### Why We Collect Your Personal Data?

We use the personal data you share with us so we can communicate with you and disseminate information on behalf of the DCYA and Pobal and other relevant agencies and stakeholders.

#### Sharing & Disclosure

We strive to keep your personal data safe and only share it when necessary. We recognise that you have a right to know that the information you share with CCCC is maintained confidentially. We only disclose your information as authorised in

this Statement. We do not rent or sell your Personal Information to anyone. We may share your personal information with the third parties listed below.

#### Who We May Share Your Personal Information With:

- Department of Children & Youth Affairs (DCYA)
- Pobal PIP System & Pobal Compliance Officers
- An Garda Síochána
- Tusla Early Years Inspectorate
- Health & Safety Authority
- National Employment Rights Authority
- The Revenue Commissioners
- Tusla – Child and Family Agency

#### Protection of Named Service & others and Disclosures for Law Enforcement

Under certain circumstances CCCC may be required to disclose your Personal Information in response to valid requests by public authorities to meet law enforcement requirements.

#### What we do with your data?

Your personal data is stored and processed in CCCC located at CCCC Address.

### How long we keep your personal data?

Your records will be kept in line with our data retention policy.

### What are your rights?

We use appropriate technical, organisational and administrative security measures to protect all personal data we hold in our records and keep it secure. Unfortunately, no organisation can guarantee complete security.

### Right of Access

Individuals have the right to access their personal data and supplementary information. Please use the Subject Access Request Form and contact the Manager at [admin@cavanccc.ie](mailto:admin@cavanccc.ie) or in writing at Unit 5 Cavan Enterprise Centre, Killygarry, Dublin Rd, Cavan. We will acknowledge your request and respond to you within 1 month

### Right to Rectification

Please advise the service of any changes in your or your personal information, as soon as possible. Should you believe that any personal data we hold on you is incomplete or incorrect complete, you have the ability to request to see this information and have it rectified.

### Right to Erasure

In certain circumstances, data subjects have the right to erasure of their data. Please contact the Manager at [admin@cavanccc.ie](mailto:admin@cavanccc.ie) or in writing at Unit 5 Cavan Enterprise Centre, Killygarry, Dublin Rd, Cavan. We will acknowledge your request and respond to you within 1 month. This is not an absolute right and only applies in certain circumstances.

### Right to Restrict Processing

Individuals have the right to request the restriction or suppression of their personal data. Please contact the Manager at [admin@cavanccc.ie](mailto:admin@cavanccc.ie) or in writing at Unit 5 Cavan Enterprise Centre, Killygarry, Dublin Rd, Cavan. We will acknowledge your request and respond to you within 1 month. This is not an absolute right and only applies in certain circumstances.

### Right to Object

You have the right to object and be removed from any direct marketing emails

### Right to be informed

This privacy policy explains what information we need to collect and how we use it.

### Right to Portability

Data subjects can ask that their personal data be transferred to them or a third party in machine readable format (Word, PDF, etc.). However, such requests can only be fulfilled if the data in question is: 1) provided by the data subject to the service, 2) is processed automatically and 3) is processed based on consent or fulfilment of a contract.

In the event, that you wish to complain about how we have handled your personal data, please contact the Manager of Cavan County Childcare Committee at [admin@cavancce.ie](mailto:admin@cavancce.ie) or in writing at Unit 5 Cavan Enterprise Centre, Killygarry, Dublin Rd, Cavan. The Manager will then investigate your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact Irish Data Protection Authority and file a complaint with them.

## DISCLAIMER

While all reasonable care has been taken in the compilation and publication of the contents of this web site, Cavan County Childcare Committee cannot guarantee the accuracy or suitability of the information or materials contained here.

Cavan County Childcare Committee shall not be liable, directly or indirectly, to the user or any other third party for any damage resulting from the use of the information contained or implied Cavan County Childcare Committee Website.

Cavan County Childcare Committee does not assume legal or other liability for any inaccuracy, mistake, mis-statement or any other error of whatsoever nature contained herein.

Cavan County Childcare Committee hereby formally disclaims liability in respect of such aforesaid matters.

The information contained within this site is of a condensed and general informational nature only and can change from time to time. It should not, by itself, be relied upon in determining legal rights or other decisions.

Visitors to the site are advised to verify, by direct and live contact with Cavan County Childcare Committee, any information on which they may wish to rely.

Cavan County Childcare Committee has endeavoured to attribute copyright or other intellectual rights to the rightful owners where such course has been appropriate. Where any attribution has been missed or overlooked Cavan County Childcare Committee, on being informed, will correct this omission.

Users of this website should be aware that where you link to another website Cavan County Childcare Committee has no control over that other website. Cavan County Childcare Committee has no responsibility for the privacy practices of other websites.

By visiting Cavan County Childcare Committee Website you are accepting this disclaimer.

## APPENDIX - DATA RETENTION POLICY

### 1. Introduction

[Cavan CCC] strives to comply with applicable laws and regulations related to the retention of personal data in Ireland.

This policy outlines the basic rules by which [Cavan CCC] manages the retention of the personal data of parents, children, suppliers, employees, practitioners, and other individuals that is processed by [Cavan CCC]. The policy sets out the required retention periods for different categories of data and sets out the minimum standards to be applied when destroying certain information.

### 2. Who is this policy for?

All employees either permanent or temporary, all contractors, all volunteers and students, regardless of their length of employment/placement in the service, are required to read and understand this document, so they are fully aligned with the policy of [Cavan CCC]. This document will be made available to parents or guardians on request.

This policy applies to all data used at [Cavan CCC]. Examples of data include:

- Emails
- Hard copy documents
- Soft copy documents
- Video, audio and photographs
- Data generated by physical access control systems (Keypads, Fob systems etc.)
- Website

- Social Media

### 3. Retention Rules

#### Retention Schedule

The Co-ordinator/Manager defines the time period (Appendix 1) for which documents and electronic records should be retained through the Data Retention Schedule. These retention periods are predominantly determined by statutory obligations.

As an exemption, retention periods within the Data Retention Schedule will be prolonged in cases such as:

- Ongoing investigations from Irish authorities, if there is a chance records of personal data are needed by [Cavan CCC] to prove compliance with any legal requirements; or
- When exercising legal rights during legal cases or similar court proceedings recognised under Irish law.

#### Safeguarding of Data during Retention Period

If personal data is physically retained in hard copy format this personal data may become out of date quickly and this will be considered by the Co-ordinator/ Manager. If personal data is retained on electronic storage media (hard drive, server) or in the cloud, the Owner/ Manager will ensure that backup copies of the information also is available. The 3-2-1 backup strategy will be used: 3 copies total, 2 local copies, 1 offsite. Responsibility for the storage of data falls to the Co-ordinator/Manager.

#### Destruction of Data

[Cavan CCC] and its employees will regularly review all data, whether held electronically or in hard copy format, to decide whether to destroy or delete any data once the purpose for which those documents were created is fulfilled. See Appendix 1 which outlines the Data Retention Schedule. Overall responsibility for the destruction of data falls to the Co-ordinator/Manager.

Once the decision is made to dispose of personal data according to the Data Retention Schedule, the data will be deleted, shredded or otherwise destroyed appropriately.

The method of destruction varies and will be dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly sensitive personal data) will be disposed of as confidential waste and be subject to secure electronic deletion. The Document Disposal Schedule section below defines the method of disposal.

The specific deletion or destruction process may be carried out either by an employee or by an internal or external service provider that the Owner/ Manager subcontracts for this purpose. Destruction of data is always approved by the Co-ordinator/Manager and the details recorded. Any applicable general provisions under relevant data protection laws and [Cavan CCC]'s Personal Data Protection Policy shall be complied with.

Appropriate controls are in place to prevent the permanent loss of essential information of [Cavan CCC] as a result of malicious or unintentional destruction of information. [These controls include restricting access to the filing cabinet to only those who are permitted to access the data. These controls include password protected access to the IT equipment that stores the data.

The Co-ordinator/Manager shall fully document and approve the destruction process (Appendix 2 gives a sample data disposal schedule)

#### [Breach, Enforcement and Compliance](#)

The person appointed with responsibility for Data Protection, the Co-ordinator/Manager, ensures that each employee complies with this policy. It is also the responsibility of the Owner/ Manager to assist any local office with enquiries from any local data protection or governmental authority.

Any suspicion of a breach of this Policy must be reported immediately to the Co-ordinator/Manager. All instances of suspected breaches of the Policy shall be investigated, documented and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence and possibly litigation, financial loss and damage to [Cavan CCC] reputation, personal injury, harm or loss. Non-compliance with this Policy by employees, or any third parties, who have been granted access to [Cavan CCC] premises or data, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

#### 4. Document Disposal

##### Routine Disposal Schedule

Records (only those containing personal data) which may be routinely destroyed unless subject to an on-going legal or regulatory inquiry are as follows:

- Announcements and notices of day-to-day activities;
- Message slips;
- Outing reminder slips;
- Newsletters.

The Co-ordinator/Manager will determine what documents can be routinely destroyed.

If there is a current court case or legal proceedings, all documents will be retained. Advice will be sought before disposing of documentation that may be subject to legal proceedings.

##### [Destruction Method](#)

Documents that include any personal data shall be disposed of confidentially (cross-cut shredded and incinerated) and shall be subject to secure electronic deletion if stored electronically. The Data Disposal Schedule will be completed in all cases of disposing of documents containing personal data. Confirmation of destruction will be sought as needed.

## 5. Validity and document management

This document is valid from \_\_\_\_\_(date).

The owner of this document is the Co-ordinator/Manager, who must check and, if necessary, update the document at least once a year.

This policy was adopted by (Cavan CCC) on Date: \_\_\_\_\_

Signed by: \_\_\_\_\_ On behalf of Management

Position in Setting (Manager or Chairperson of Board of Management)

This policy will be reviewed by \_\_\_\_\_ on \_\_\_\_\_

Disclaimer: Please note this is a guide to a Data Retention Policy. It is not meant to be directly copied and it is highly recommended that all members develop documents specific to their service and needs.

## 6. DATA RETENTION SCHEDULE AND DATA DISPOSAL SECTION AND PERSONAL DATA RETENTION

### Data Retention Schedule

Reference No.	Data Set	Description	Documentation	Retention Period	Final Action
---------------	----------	-------------	---------------	------------------	--------------

					Archive or Dispose
	Agreements & Contracts	Pobal Grant Agreements to Cavan County Childcare Committee	Hard copies in Coordinators filing cabinet and Clerical Officers filing cabinet. Soft copies on Coordinators hard drive Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Agreements & Contracts	Agreements with Trainers	Hard copies in Coordinators filing cabinet and Clerical Officers filing cabinet. Soft copies on Coordinators hard drive Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Agreements & Contracts	Collaboration Agreement with Music Generation Cavan	Hard copies in Coordinators filing cabinet and Clerical Officers filing cabinet. Soft copies on Coordinators hard drive Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Grants	Parent & Toddler grants Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Grants	Childminding Development Grants Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Grants	Small Scale Capital Grants Guidelines, Application forms,	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive	7 Years after the delivery period	Dispose

		Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails	Email		
	Grants	Large scale capital grants Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Grants	Learner Fund Bursary Guidelines, Application forms, Recommendations, List of refusals Acknowledgements of funding correspondence Minutes of meetings E mails	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Email	7 Years after the delivery period	Dispose
	Grandfathering declarations	Grandfathering declaration forms	Hard copies in Coordinators filing cabinet and Clerical Officers filing cabinet.	7 Years after the delivery period	Archive
	Reports	Annual action Plans	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
		Local Implementation Plans	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose

		Individual staff reports	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Soft copies on individual workers hard drive Email	7 Years after the delivery period	Dispose
		Project work reports	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
		CAVAN CCC strategy documents	Soft copies on CAVAN CCC G Drive Cavan CCC Web Site Email	7 Years after the delivery period	Dispose
		Mid-Year reports	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
		End of Year Reports	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
		Pobal Audit Reports	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
		National Siolta Aistear Initiative	Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	7 Years after the delivery period	Dispose
	Contact details	Cavan CCC members	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email Soft copy lists on web site Soft copy lists on CAVAN CCC Mind a client database	Keep indefinitely	Minimise data and archive
		Cavan CCC working group members	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Coordinators hard drive Email	Keep indefinitely	Minimise data and archive
		Cavan CCC Staff	Hard copies in Administration filing cabinet.	Keep indefinitely	Minimise data and archive

			<p>Soft copies on CAVAN CCC G Drive</p> <p>Soft copies on Coordinators hard drive</p> <p>Email</p> <p>Soft copy lists on web site</p> <p>Soft copy lists on CAVAN CCC Mind a client database</p>		
		Registered Early Years Services in Cavan	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on CAVAN CCC G Drive</p> <p>Soft copies on Coordinators hard drive</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Soft copy lists on web site</p> <p>Soft copy lists on CAVAN CCC Mind a client database</p>	Keep indefinitely	Minimise data and archive
		Early years staff members employed in Cavan	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on CAVAN CCC G Drive</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Soft copy lists on CAVAN CCC Mind a client database</p>	Keep indefinitely	Minimise data and archive
		School Age Childcare Services in Cavan with a DCYA reference number	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on CAVAN CCC G Drive</p> <p>Soft copies on Coordinators hard drive</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Soft copy lists on web site</p> <p>Soft copy lists on CAVAN CCC Mind a client database</p>	Keep indefinitely	Minimise data and archive
		Registered Childminders in Cavan	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on CAVAN CCC G Drive</p>	Keep indefinitely	Minimise data and archive

			Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on CAVAN CCC Mind a client database		
		Voluntary Notified Childminders in Cavan	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on CAVAN CCC Mind a client database	Keep indefinitely	Minimise data and archive
		Parent & Toddler Groups in Cavan	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on CAVAN CCC Mind a client database	Keep indefinitely	Minimise data and archive
		CAVAN CCC Newsletter recipients	Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email	Keep indefinitely	Minimise data and archive
	Meetings	Cavan CCC & its working groups Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
		Childcare Committees Ireland & it's working group Minutes of meetings	Hard copies in Administration filing cabinet.	7 Years after the delivery period	Dispose

		Agendas Supporting documents	Soft copies on Individual workers hard drive Email		
		Cavan CCC team meetings Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
		Pobal Performance Dialogue meetings Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
		LCDC working group meetings Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on CAVAN CCC G Drive Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
		CYPSC & its working groups meetings Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
		Cavan Travellers Support Group Minutes of meetings Agendas Supporting documents	Hard copies in Administration filing cabinet. Soft copies on Individual workers hard drive Email	7 Years after the delivery period	Dispose
	Action Files	Soundworlds Extract from LIP showing summary of Action, target group, budget allocation Extract from Cavan CCC minutes stating that the LIP (and action) were approved	Hard copies in Administration filing cabinet. Soft copies on Individual workers hard drive Email Newsletter Articles	7 Years after the delivery period	Dispose

		<p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>			
		<p>Preschool Yoga</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Newsletter Articles</p>	7 Years after the delivery period	Dispose
		<p>Crisis Intervention</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p>	7 Years after the delivery period	Dispose

		(this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)			
		<p>National Siolta Aistear Initiative</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Newsletter Articles</p>	7 Years after the delivery period	Dispose
		<p>Access Inclusion Model</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Newsletter Articles</p>	7 Years after the delivery period	Dispose

		meeting / training / information session etc.)			
		<p>Newsletter</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>CAVAN CCC Office display stands and tables</p> <p>CAVAN CCC web site</p>	7 Years after the delivery period	Dispose
		<p>Inclusion Seminar</p> <p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>	<p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Newsletter Articles</p>	7 Years after the delivery period	Dispose
		Child Protection Training	Hard copies in Administration filing cabinet.	7 Years after the delivery period	Dispose

		<p>Extract from LIP showing summary of Action, target group, budget allocation</p> <p>Extract from Cavan CCC minutes stating that the LIP (and action) were approved</p> <p>Evidence that Public Procurement guidelines were complied with.</p> <p>Documented progress &amp; final report on the project (this would include attendance sheets, venue location; subject matter of meeting / training / information session etc.)</p>	<p>Soft copies on Individual workers hard drive</p> <p>Email</p> <p>Newsletter Articles</p>		
	Financial Records	Invoices	<p>Milestone 4 system</p> <p>Soft Copy on CAVAN CCC G Drive</p>	7 Years after the delivery period	Dispose
		Fixed Assets Register	<p>Milestone 4 system</p> <p>Soft Copy on CAVAN CCC G Drive</p> <p>Hard copies in Administration filing cabinet.</p>	7 Years after the delivery period	Dispose
	Early Years Services documentations	<p>Records on individual early years' service in Cavan</p> <p>Files of records on meetings with early years services</p> <p>Observations of these service's practise.</p> <p>Details of the service (e.g. their DCYA registration number)</p>	<p>Hard copies in individual workers filing cabinet.</p> <p>Hard copies in Administration filing cabinet.</p> <p>Soft copies on Individual workers hard drive</p> <p>Soft Copy on G Drive</p> <p>Email</p> <p>Soft copy lists on CAVAN CCC Mind a client database</p>	7 Years after the delivery period	Dispose
	CAVAN CCC Activities	Parents	Soft copy lists on CAVAN CCC Mind a client database		
		Pobal	Soft copy lists on CAVAN CCC Mind a client database		

		DCYA	Soft copy lists on CAVAN CCC Mind a client database		
		CAVAN CCC Board	Soft copy lists on CAVAN CCC Mind a client database		
		Cavan County Council	Soft copy lists on CAVAN CCC Mind a client database		
		CCI	Soft copy lists on CAVAN CCC Mind a client database		
		CYPSC	Soft copy lists on CAVAN CCC Mind a client database		
		Tusla	Soft copy lists on CAVAN CCC Mind a client database		
		ETB	Soft copy lists on CAVAN CCC Mind a client database		
		Local Collaborators	Soft copy lists on CAVAN CCC Mind a client database		
		Childminders	Soft copy lists on CAVAN CCC Mind a client database		
		Parent & Toddler Groups	Soft copy lists on CAVAN CCC Mind a client database		
		Individual ECCE worker	Soft copy lists on CAVAN CCC Mind a client database		
		General Agency	Soft copy lists on CAVAN CCC Mind a client database		
		General Enquirer	Soft copy lists on CAVAN CCC Mind a client database		
		Potential Provider	Soft copy lists on CAVAN CCC Mind a client database		
		Trainers	Soft copy lists on CAVAN CCC Mind a client database		

**te: This retention schedule is based on current statutory obligations and may be subject to change. If a specific type of data is not mentioned on this list please seek advice to develop your own retention period. This list is not exhaustive.**

## Data Disposal Schedule

Name of Records	Description	Inclusive Dates	Date of Destruction	Method of Destruction	Disposed of by
Example: child record forms	Child record forms which include the following details {medical info, address info, DOB, parental info etc}	Children attending the service from September 2012- June 2013	01/05/2018	Shredded	Coordinator/Manager Name

## Personal Data Retention

Reference No.	Data Set	Description	Documentation	Retention Period	Final Action Archive or Dispose
	Grandfathering declarations	Grandfathering declaration forms	Hard copies in Coordinators filing cabinet and Clerical Officers filing cabinet.	7 Years after the delivery period	Archive
	Reports	Individual staff reports	Soft copies on MCCC G Drive Soft copies on Coordinators hard drive Soft copies on individual workers hard drive Email	7 Years after the delivery period	Dispose
	Contact details	Cavan CCC members	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Coordinators hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		Cavan CCC working group members	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Coordinators hard drive Email	Keep indefinitely	Minimise data and archive
		Cavan CCC Staff	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Coordinators hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		Registered Early Years Services in Cavan	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Coordinators hard drive	Keep indefinitely	Minimise data and archive

			Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database		
		Early years staff members employed in Cavan	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Individual workers hard drive Email Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		School Age Childcare Services in Cavan with a DCYA reference number	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Coordinators hard drive Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		Registered Childminders in Cavan	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		Voluntary Notified Childminders in Cavan	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Individual workers hard drive	Keep indefinitely	Minimise data and archive

			Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database		
		Parent & Toddler Groups in Cavan	Hard copies in Administration filing cabinet. Soft copies on MCCC G Drive Soft copies on Individual workers hard drive Email Soft copy lists on web site Soft copy lists on MCCC Mind a client database	Keep indefinitely	Minimise data and archive
		MCCC Newsletter recipients	Soft copies on MCCC G Drive Soft copies on Individual workers hard drive Email		
	Early Years Services documentations	Records on individual early years' service in Cavan Files of records on meetings with early years services Observations of these service's practise. Details of the service (e.g. their DCYA registration number)	Hard copies in individual workers filing cabinet. Hard copies in Administration filing cabinet. Soft copies on Individual workers hard drive Soft Copy on G Drive Email Soft copy lists on MCCC Mind a client database	7 Years after the delivery period	Dispose
	MCCC Activities	Parents	Soft copy lists on MCCC Mind a client database		
		Childminders	Soft copy lists on MCCC Mind a client database		
		Parent & Toddler Groups	Soft copy lists on MCCC Mind a client database		
		Individual ECCE worker	Soft copy lists on MCCC Mind a client database		
		Trainers	Soft copy lists on MCCC Mind a client database		



