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ROSCOMMON COUNTY COUNCIL

Corporate

Data Protection

Policy and Procedures

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1.0 Purpose

The General Data Protection Regulation (GDPR), which came into effect on 25th May 2018, and the Data Protection Act 2018 which gives further effect to this Regulation impose obligations on Roscommon County Council to protect all personal data under its control and provide data subjects with a range of rights in relation to their personal data. The purpose of this document is to outline Roscommon County Council's policy and procedures for:

- Fulfilling its obligations under data protection legislation;
- Facilitating data subjects to exercise their rights.

2.0 Definitions

For the purposes of this policy and procedures document the following definitions apply:

- **Controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- **Data Subject:** is an identified or identifiable natural person to whom personal data relates.
- **Data Subject Request:** is a request received from a data subject to exercise his/her rights under data protection legislation.
- **Personal Data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Personal Data Breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.
- **Privacy Statement** is a document produced by Roscommon County Council to describe, in simple terms, the personal data that the Council may collect about data subjects, why it needs the personal data, how it uses the personal data and how data subjects can interact with the Council with regard to the personal data. It also provides an outline of data subjects' rights under data protection law in relation to the processing of their personal data.
- **Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of Roscommon County Council.
- **Special Categories of Personal Data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.

3.0 Scope

The scope of this document applies to the following:

- All personal data held by Roscommon County Council in physical or electronic format including personal data relating to members of the public, service users, suppliers and employees;

- All processing of personal data carried out by Roscommon County Council.

4.0 Policy

It is the policy of Roscommon County Council that:

- It will seek to act at all times in full compliance with data protection legislation in its processing of personal data;
- GDPR principles are respected and strictly adhered to;
- The rights of data subjects are fully respected and protected;
- Measures exist to respond appropriately to personal data breaches;
- Appropriate governance mechanisms exist to oversee compliance with data protection legislation.

5.0 Compliance

- 5.1** Robust and pro-active policies, procedures and practices will be introduced and maintained by the Council to ensure full compliance with data protection legislation.
- 5.2** Responsibility for acting in full compliance with data protection legislation rests with every Department/Business Unit of the Council and every staff member.

6.0 GDPR Principles

The following GDPR principles shall underpin all of Roscommon County Council's data protection processes, practices and procedures:

- Lawfulness, Fairness and Transparency;
- Purpose Limitation;
- Data Minimisation;
- Accuracy;
- Storage Limitation;
- Integrity and Confidentiality;
- Accountability.

6.1 Lawfulness, Fairness and Transparency

6.1.1 Roscommon County Council is committed to ensuring that the personal data it processes is obtained lawfully, fairly and in a transparent manner.

6.1.2 The specified purpose for which personal data is being obtained must be lawful. Under Article 6 of the GDPR the processing of personal data is lawful only if at least one of the following conditions apply:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- The processing is necessary for compliance with a legal obligation to which Roscommon County Council is subject;
- The processing of the personal data is necessary in order to protect the vital interests of the data subject or of another natural person;
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority which is vested in Roscommon County Council;

- The processing is necessary for the purposes of the legitimate interests pursued by Roscommon County Council or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This condition shall not apply to processing carried out by public authorities in the performance of their tasks.

6.1.3 Special Categories of Personal Data are subject to additional protection. Under Article 9 of the GDPR the processing of Special Categories of Personal Data is lawful only if at least one of the following conditions apply:

- The data subject has given explicit consent to the processing of those personal data for one or more specified purposes;
- The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Controller or of the data subject in the field of employment and social security and social protection;
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- The processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other non-profit-seeking body with a political, philosophical, religious or trade-union aim and on the condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
- The processing relates to personal data which are manifestly made public by the data subject;
- The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- The processing is necessary for reasons of substantial public interest;

- The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services pursuant to contract with a health professional;
- The processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices; or
- The processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with the GDPR.

6.1.4 In instances where Roscommon County Council is relying on consent as a lawful processing condition the data subject's consent must be freely given, unambiguous, specific, informed and given through a clear and affirmative action. Data subjects must be informed, at the time of the giving of consent, of their rights to withdraw consent at any time. The method of withdrawing consent must be as easy as giving it.

6.1.5 Art 2(2)(d) of the GDPR provides that *'this Regulation does not apply to the processing of personal data by Competent Authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security'*. The Law Enforcement Directive 2016/680 provides for the processing of personal data for such purposes.

6.1.6 Roscommon County Council will aim to be totally transparent in the processing of its personal data through the publication of appropriate and comprehensive **Privacy Statements**.

6.2 Purpose Limitation

Roscommon County Council will, except where otherwise provided by data protection legislation, take measures to ensure that the processing of personal data is limited to the purposes for which it was obtained.

6.3 Data Minimisation

Roscommon County Council will put in place appropriate measures to ensure that personal data held by it is proportionate to the specified purpose for which it was obtained. The personal data collected should therefore be adequate and not excessive for the specified purpose. Consequently, all application forms and other means that are used to capture personal data will be designed so that they capture the minimum amount that is necessary to achieve the specified purpose.

6.4 Accuracy

Roscommon County Council will implement appropriate measures to ensure that errors in personal data are identified, reported and corrected in as timely a manner as possible. These will include measures that will:

- Periodically check personal data for its accuracy;
- Focus on personal data that is time-sensitive, i.e. likely to become inaccurate over time unless it is updated;
- Ensure that the Council's records and databases are kept up-to-date.

6.5 Storage Limitation

Roscommon County Council will retain personal data for no longer than is necessary. Retention periods will be determined by reference to guidelines issued by the Local Government Management Agency (LGMA).

6.6 Integrity & Confidentiality

- 6.6.1** Roscommon County Council will maintain the highest standards of technical and organisational security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing.
- 6.6.2** In order to achieve the highest standards of technical and organisational security appropriate policies and procedures will be developed which will outline the specific security measures to be implemented and responsibilities within the organisation in terms of their implementation.
- 6.6.3** Security measures will be designed in such a manner that they are proportionate to the risks and sensitivities associated with the various categories of personal data that are under the control of Roscommon County Council.
- 6.6.4** Roscommon County Council shall ensure that it will, where processing is carried out on its behalf, choose a processor that provides sufficient guarantees in respect of the technical and organisational security measures that are required to protect personal data.

6.7 Accountability

The principal of accountability creates a positive duty on Roscommon County Council to actively monitor and govern the management of personal data. The Council must not only comply but must also be in a position to demonstrate GDPR compliance. Consequently, Roscommon County Council will implement appropriate monitoring and reporting mechanisms to facilitate the demonstration of compliance with GDPR.

7.0 Rights of Data Subjects

It is the policy of Roscommon County Council to ensure that the following rights of data subject are fully respected and that data subjects wishing to avail of these rights are facilitated in a timely and comprehensive manner:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure of personal data (also known as the 'right to be forgotten');
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

This involves ensuring that, subject to the provisions of data protection legislation, that:

- The process for the making by data subjects of a request to exercise their rights is as straightforward as possible; and
- Circumstances for refusing a request are fair and transparent.

7.1 The Right to be Informed

Data subjects have the following rights to be informed:

7.1.1 Rights where Personal Data is Collected from Data Subjects

Where personal data is collected from data subjects Roscommon County Council must, at the time that the personal data is collected, provide the following information to the data subject:

1. Identity and contact details of the data controller i.e. Roscommon County Council (and where applicable, the controller's representative);

2. Contact details of the Data Protection Officer (i.e. the person with responsibility for data protection matters within Roscommon County Council);
3. Purpose(s) of the processing and the lawful basis for processing the personal data;
4. Where processing is based on the legitimate interests of Roscommon County Council or a third party, the legitimate interests involved;
5. Any other recipient(s) of the personal data;
6. Where applicable, details of any intended transfers to a third country (non-EU member state) or international organisation and details of adequacy decisions and safeguards;
7. The retention period (how long Roscommon County Council will hold the personal data) or, if that is not possible, the criteria used to determine the retention period;
8. The existence of the following rights:
 - The right of access;
 - The right to rectification;
 - The right to erasure;
 - The right to portability;
 - The right to object to the processing of personal data;
 - The right to restrict the processing of personal data.
9. Where processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
10. The right to lodge a complaint with the Data Protection Commission;

11. Whether the provision of personal data is a statutory or contractual requirement, necessary to enter into a contract, an obligation, and the possible consequences of failing to provide the personal data;
12. The existence of any automated decision making processes that will be applied to the data, including profiling, and meaningful information about how decisions are made, the significance and the consequences of processing.

The right to be informed, in circumstance where personal data is collected from data subjects, will typically be fulfilled through ***Privacy Statements*** published by Roscommon County Council.

If in the event that Roscommon County Council intends to process a data subject's personal data for another purpose (other than the purpose for which the data was originally collected), it must, subject to the provisions of data protection legislation, provide the data subject, prior to that other processing, with any further relevant information as per 1 – 12 above.

7.1.2 Rights where Personal Data is Not Collected from Data Subjects

Where personal data has not been obtained from the data subject, Roscommon County Council must provide the data subject with:

- The information at 1 to 10 and 12 in *paragraph 7.1.1* above;
- Information on the types of personal data it holds about the data subject;
- Information on how it obtained the personal data and whether it came from publicly accessible sources.

Roscommon County Council should, in circumstances where personal data has not been obtained from the data subject, provide the information:

- Within a reasonable period of having obtained the personal data and, at the latest, within one month;
- If the data is used to communicate with the data subject, at the latest, when the first communication takes place;
- If it is expected that the personal data will be disclosed to another party, when the data subject's personal data is first disclosed.

The above requirements will not apply:

- Where the data subject already has the above information;
- Where the provision of such information is impossible or would involve a disproportionate effort;
- Where obtaining the information or disclosure is a legal obligation;
- Where the personal data must remain confidential due to an obligation of professional secrecy regulated by law.

7.2 The Right of Access

7.2.1 Data subjects have the right to obtain the following from Roscommon County Council:

- Confirmation of whether or not personal data concerning the data subject is being processed;
- Where personal data concerning the data subject is being processed, a copy of his or her personal information;
- Where personal data concerning the data subject is being processed, other additional information as follows:
 1. Purpose(s) of the processing;
 2. Categories of personal data;

3. Any recipient(s) of the personal data to whom the personal data has or will be disclosed, in particular recipients in third countries or international organisations and information about appropriate safeguards;
4. The retention period for the personal data or, if that is not possible, the criteria used to determine the retention period;
5. The existence of the following rights:
 - Right to rectification
 - Right to erasure
 - Right to restrict processing
 - Right to object;
6. The right to lodge a complaint with the Data Protection Commission;
7. Where personal data is not collected from the data subject, any available information as to its source;
8. The existence of automated decision making, including profiling and meaningful information about how decisions are made, the significance and the consequences of processing.

7.2.2 The right to the information above must not adversely affect the rights and freedoms of others.

7.2.3 A separate ***Data Subject Access Policy and Procedures*** will be developed by Roscommon County Council to assist data subjects with their requests for information.

7.3 The Right to Rectification of Inaccurate or Incomplete Data

7.3.1 Data subjects have the right to have inaccurate personal data rectified, by Roscommon County Council without undue delay.

7.3.2 Data subjects have the right to have incomplete personal data completed including by means of providing supplementary information.

7.4 The Right to Erasure of Personal Data (also known as the right to be forgotten)

7.4.1 Data subjects have the right to have their personal data erased, without undue delay, by Roscommon County Council, if one of the following grounds applies:

- Where the data subject's personal data is no longer necessary in relation to the purpose for which it was collected or processed;
- Where the data subject withdraws his or her consent to the processing of the personal data and there is no other lawful basis for processing the data;
- Where the data subject objects to the processing of the personal data and there are no overriding legitimate grounds for continuing the processing;
- Where the data subject objects to the processing of personal data for direct marketing purposes;
- Where the data subject's personal data has been unlawfully processed;
- Where the data subject's personal data has to be erased in order to comply with a legal obligation;
- Where the data subject's personal data has been collected in relation to the offer of information society services to a child.

7.4.2 Where Roscommon County Council has made personal data public and, on the basis of one of the above grounds, is obliged to erase the data, the following shall apply:

- Roscommon County Council must communicate any rectification or erasure of personal data to each recipient to whom the personal data has been disclosed, unless this is impossible or involves disproportionate effort;
- If the data subject requests information on recipients of his or her personal data, Roscommon County Council must inform the data subject about the recipients;
- Roscommon County Council will take reasonable steps to inform other controllers, who are processing the personal data, that the data subject has requested the erasure by it of any links to or copies of the data. Reasonable steps mean taking

account of available technology and the cost of implementation including technical measures.

7.4.3 The right of erasure will not apply where processing is necessary for:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation, the performance of a task carried out in the public interest or in the exercise of official authority;
- Reasons of public interest in the area of public health;
- Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- Establishment, exercise or defence of legal claims.

7.5 The Right to Data Portability

7.5.1 In some circumstances, the data subject may be entitled to obtain personal data from a data controller in a format that makes it easier to reuse the data subject's information in another context, and to transmit this data to another data controller of the data subject's choosing without hindrance. This is referred to as the right to data portability.

7.5.2 This right only applies where processing of personal data (supplied by the data subject) is carried out by automated means, and where the data subject has either consented to processing, or where processing is conducted on the basis of a contract between the data subject and the data controller.

7.5.3 This right only applies to the extent that it does not affect the rights and freedoms of others.

7.5.4 Where this right applies, data controllers must provide and transmit personal data in structured, commonly used and machine readable form. Data is structured and machine readable if it can be easily processed by a computer.

7.5.5 Under this right, the data subject can ask a data controller to transmit his or her data to another data controller, if such transmission is technically feasible.

7.6 The Right to Object to the Processing of Personal Data

7.6.1 Data subjects have the right to object to certain types of processing of their personal data where this processing is carried out in connection with tasks in the public interest, or under official authority, or in the legitimate interests of others.

7.6.2 Data subjects have a stronger right to object to processing of their personal data where the processing relates to direct marketing. Where a data controller is using a data subject's personal data for the purpose of marketing something directly to the data subject, or profiling the data subject for direct marketing purposes, the data subject can object at any time, and Roscommon County Council must stop processing as soon as it receives the data subject's objection.

7.6.3 The data subject may also object to processing of his or her personal data for research purposes, unless the processing is necessary for the performance of a task carried out in the public interest.

7.6.4 In order to object to processing, the data subject must contact Roscommon County Council and state the grounds for his or her objection. These grounds must relate to the data subject's particular situation. Where the data subject has made a valid objection, Roscommon County Council must cease processing the data subject's personal data, unless the County Council can provide compelling legitimate reasons to continue processing the data subject's data. Roscommon County Council can also lawfully continue to process the data subject's personal data if it is necessary for certain types of legal claims.

7.6.5 Where the right to object applies, Roscommon County Council is obliged to notify the data subject of this at the time of its first communication with the data subject.

7.6.6 Where processing is carried out online, Roscommon County Council must offer an online method to object.

7.7 The Right to Restrict the Processing of Personal Data

7.7.1 Data subjects have a limited right of restriction to the processing of their personal data by Roscommon County Council. Where processing of personal data is restricted, it can be stored by Roscommon County Council, but most other processing actions, such as deletion, will require the data subject's permission.

7.7.2 This right to restriction applies in four ways. The first two types of restriction of processing apply where the data subject has exercised his or her right to object to the processing of personal data or where the data subject has contested the accuracy of his or her personal data. In these cases, the restriction applies until Roscommon County Council has determined the accuracy of the data, or the outcome of the data subject's objection.

7.7.3 The third situation in which the data subject can request restriction relates to processing which is unlawful. In these cases, if the data subject does not want Roscommon County Council to delete the data, he or she can request restriction of the personal data instead.

7.7.4 The fourth type of restriction of processing applies where the data subject requires data for the purpose of a legal claim. In this case, the data subject can request restriction even where Roscommon County Council no longer needs the data.

7.7.5 Where the data subject has obtained restriction of processing of his or her data, Roscommon County Council must inform the data subject before lifting the restriction.

7.8 Rights in Relation to Automated Decision Making, Including Profiling

7.8.1 Data subjects have the right not to be subjected to a decision based solely on automated processing. Processing is “automated” where it is carried out without human intervention and where it produces legal effects or significantly affects the data subject. Automated processing includes profiling.

7.8.2 Automated processing is permitted only with the data subject’s express consent, when necessary for the performance of a contract or when authorised by Union or Member State law. Where one of these exceptions applies, suitable measures must be in place to safeguard the data subject’s rights, freedoms and legitimate interests.

8.0 Data Subject Request

The following procedures apply for ensuring that requests made by data subjects to exercise their rights (data subject request) are facilitated in a timely and comprehensive manner:

8.1 Required Format for Submitting a Data Subject Request

Data subjects who wish to make a data subject request are required to submit the request in writing in physical or electronic format e.g. by letter or e-mail.

8.2 Confirming the Identity of a Data Subject

Where it is deemed necessary or appropriate Roscommon County Council may request the provision of additional information to confirm the identity of the person submitting the request. This is applicable to the rights of access, rectification, erasure, restriction of processing, objection to processing and data portability and rights in relation to automated decision making and profiling.

8.3 Acknowledging a Data Subject Request

Roscommon County Council shall acknowledge the request without undue delay and in any event within 2 weeks of receiving the request. The acknowledgement shall specify the expected timeframe for issuing a decision on the request and the procedure for making a complaint to the Data Protection Commission in the event that a decision is not made.

8.4 Decision on a Data Subject Request

Roscommon County Council may grant or refuse a request.

8.5 Granting a Data Subject Request

In instances where a request is being granted, the following applies:

1. Roscommon County Council shall provide to the data subject information/details of action taken without undue delay and in any event within one month of receipt of the request.
2. Roscommon County Council may however extend the period for providing data subjects with information/details of action taken by two further months in cases where the request is complex or it has received a number of requests from the same individual. In such circumstances the data subject shall be informed of the extension within one month of receipt of the request and provided with a reason for the extension.
3. Roscommon County Council will normally provide information/details of action taken to a data subject free of charge.
4. However, if a request is excessive or repetitive, Roscommon County Council may charge a reasonable fee taking into account the administrative costs of providing information/taking the action requested.

5. The information/details of action taken provided to a data subject on foot of a decision to grant a request must be:
 - Provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language, particularly for any information/details of action addressed to a child;
 - Provided in writing, or by other means, including, where appropriate, by electronic means;
 - Where the data subject makes the request in electronic form, where possible, the information/details of action must be provided by electronic means, unless otherwise requested by the data subject;
 - When requested by the data subject, the information/details of action may be provided orally, provided that the identity of the data subject is proven.
6. The notification of a decision to grant a request must inform the data subject of his or her right to make a complaint to the Data Protection Commission if he or she is dissatisfied with the decision and outline the process for making such a complaint to the Data Protection Commission.

8.6 Refusing a Data Subject Request

In instances where a request is being refused, the following applies:

1. A data subject request may be refused in the following instances:
 - Where it is considered to be manifestly unfounded or excessive, in particular because of its repetitive character;
 - Where the scope of access is restricted under provisions contained in data protection legislation enacted by the State.

2. Roscommon County Council shall notify the requester of its refusal of a request within one month of receiving the request.
3. The reason(s) for refusing a request shall be outlined in the notification.
4. The notification of a decision to refuse a request must inform the data subject of his or her right to make a complaint to the Data Protection Commission if he or she is dissatisfied with the decision and provide details of the process for making a complaint to the Data Protection Commission.

8.7 Data Subject Requests Register

- 8.7.1 The Data Protection Officer shall maintain a register which provides a summary record of each data subject request received by Roscommon County Council and the outcome in terms of the decision made on the request.
- 8.7.2 Details of any subsequent complaints to the Data Protection Commission made by data subjects with regard to their data subject requests and their outcomes shall also be maintained on the summary record.

9.0 Personal Data Breach

- 9.1 Roscommon County Council aims to ensure that in the event of a personal data breach occurring that appropriate measures exist to facilitate:
 - The identification of personal data breaches and their consequences;
 - The notification of personal data breaches;
 - Limiting and / or remedying the impact of personal data breaches;
 - Implementing controls to prevent a reoccurrence of the personal data breach.
- 9.2 Appropriate policies and procedures will be developed by the County Council to facilitate it to respond appropriately to personal data breaches.

10.0 Governance

Roscommon County Council will appoint a Data Protection Officer to facilitate effective governance by the organisation with regard to its responsibilities under data protection legislation. It is vital that strong governance exists in order to ensure that the Council's data protection processes and practices are sufficiently robust and thorough to enable the organisation to discharge its obligations in a manner that is responsible, transparent and fully accountable. The role of the Data Protection Officer, in this regard, will include:

- Providing advice to the organisation on the measures that are necessary to achieve and retain compliance with data protection legislation;
- Facilitating the development and maintenance of appropriate policies and procedures in relation to the protection of personal data;
- Acting as a contact point for data subjects with regard to the exercise of their rights under data protection legislation;
- Liaising and co-operating with the Data Protection Commission as appropriate.

11.0: Complaints to the Data Protection Commission

11.1 Data subjects may make a complaint to the Data Protection Commission if they consider that Roscommon County Council's processing of their personal data is contrary to data protection legislation.

11.2 Contact details for the Data Protection Commission are as follows:

Phone Number: 01 7650100 / 1800 437737.

Postal Address: Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28.

Online: www.dataprotection.ie provides details for online contact.

12.0: Awareness

Roscommon County Council shall implement appropriate measures to make its employees aware of the contents of this policy and procedures document.

13.0 Training and Development

Roscommon County Council will arrange the delivery of the following training and development on an on-going basis:

- General awareness raising training designed to provide an overview of data protection policies, procedures and practices to all management and staff members;
- Specialized training and development focusing on specific aspects of data protection for appropriate management and staff members.

14.0 Monitoring and Review

Provisions contained in this policy and procedures document shall be subject to on-going monitoring and review.

15.0 Further Information

15.1 Further information and advice on the operation of this policy and procedures document is available from the Data Protection Officer, Roscommon County Council.

15.2 Contact details for the County Council's Data Protection Officer are as follows:

Phone:	090 6637100
E-mail:	dataprotection@roscommoncoco.ie
Website:	www.roscommoncoco.ie
Postal Address:	Roscommon County Council Áras an Chontae Roscommon F42 VR98.