



DATA PROTECTION POLICY

Last updated: June 2020

By: Cathy Gilligan (Data Protection Officer)

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Context

“Discretion will protect you, and understanding will guard you.” (Proverbs 2:11)

The integrity of each person who comes in contact with Koinonia John the Baptist Ireland, whether in the capacity of consecrated personnel, lay volunteers or trustees, members or participants in our ministry. We make every practicable effort to ensure that any information we hold is maintained according to data protection legislation and the biblical principles of discretion and good stewardship.

This policy, and any other documents referred to in it, sets out the basis on which we will process any personal data we collect or process. It does not form part of any personnel's contract of employment and may be amended at any time.

Relevant Legislation

This document details Koinonia John the Baptist Ireland's legal obligations under the **Data Protection Act 2018**, and the **General Data Protection Regulation**, collectively referred to in this policy as 'data protection requirements'.

Policy Statement

Every day our organisation will receive, use and store personal information about individuals who relate to Koinonia John the Baptist Ireland in different ways - consecrated and lay colleagues, volunteers, members, ministry participants, those requesting prayer or information, and colleagues of various networks, sectors and nationalities. It is important that this information is handled lawfully and appropriately in line with the Data Protection Requirements as identified in the laws named above.

We take our data protection duties seriously, because we respect the trust that is being placed in us to use personal information appropriately and responsibly.

As of 24 June 2020, the Pastoral Council has nominated Cathy Gilligan (Company Secretary) as Data Protection Officer. She is responsible for ensuring compliance with the Data Protection Requirements and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Officer or reported in line with the organisation's Grievance Policy.

What is Personal Data?

Personal data means data (whether stored electronically or paper based) relating to a living individual who can be identified directly or indirectly from that data (or from that data and other information in our possession).

Processing is any activity that involves use of personal data. It includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Sensitive personal data includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including with the consent of the individual.

Data Protection Principles

Anyone processing personal data, must ensure that data is:

- Processed fairly, lawfully and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and any further processing is completed for a compatible purpose.
- Adequate, relevant and limited to what is necessary for the intended purposes.
- Accurate, and where necessary, kept up to date.
- Kept in a form which permits identification for no longer than necessary for the intended purposes.
- Processed in line with the individual's rights and in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Not transferred to people or organisations situated in countries without adequate protection and without firstly having advised the individual.

Fair and Lawful Processing

The Data Protection Requirements are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the individual.

In accordance with the Data Protection Requirements, we will only process personal data where it is required for a lawful purpose. The lawful purposes include (amongst others): whether the individual has given their consent, the processing is necessary for performing a contract with the individual, for compliance with a legal obligation, or for the legitimate interest of the charity. When sensitive personal data is being processed, additional conditions must be met.

Processing for Limited Purposes

In the course of our administration and ministry, we may collect and process personal data. This may include data we receive directly from a data subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, location data, business partners, sub-contractors in technical, payment and delivery services, credit reference agencies and others).

We will only process personal data for the specific purposes or for any other purposes specifically permitted by the Data Protection Requirements. We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter.

Notifying Individuals

If we collect personal data directly from an individual, we will inform them about:

- The purpose or purposes for which we intend to process that personal data, as well as the legal basis for the processing.
- Where we rely upon the legitimate interests of the charity to process personal data, the legitimate interests pursued.
- The types of third parties, if any, with which we will share or disclose that personal data.
- The fact that the charity intends to transfer personal data to a non-European Economic Area (EEA) country or international organisation and the appropriate and suitable safeguards in place.
- How individuals can limit our use and disclosure of their personal data.
- Information about the period that their information will be stored or the criteria used to determine that period.
- Their right to request from us as the controller access to and rectification or erasure of personal data or restriction of processing.
- Their right to object to processing and their right to data portability.
- Their right to withdraw their consent at any time (if consent was given) without affecting the lawfulness of the processing before the consent was withdrawn.
- The right to lodge a complaint with the Information Commissioners Office.

- Other sources where personal data regarding the individual originated from and whether it came from publicly accessible sources.
- Whether the provision of the personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal data and any consequences of failure to provide the data.

We will inform data subjects whose personal data we process that we are the data controller with regard to that data and our contact details are **Cathy Gilligan (Data Protection Officer)**, Koinonia John the Baptist Ireland, 189 Carnlough Road, Broughshane, Ballymena, County Antrim BT43 7JW.

Adequate, Relevant, Non-Excessive Processing

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

Accurate Data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

Processing of Data

Timely Processing

We will not keep personal data longer than is necessary for the purpose or purposes for which it was collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

Processing in line with Data Subject's Rights

We will process all personal data in line with data subjects' rights, in particular their right to:

- Confirmation as to whether or not personal data concerning the individual is being processed.
- Request access to any data held about them by a data controller (see also Clause 15 Subject Access Requests).
- Request rectification, erasure or restriction on processing of their personal data.
- Lodge a complaint with a supervisory authority.
- Data portability.
- Object to processing including for direct marketing.
- Not be subject to automated decision making including profiling in certain circumstances.

Data Security

We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental or unlawful destruction, damage, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

We will put in place procedures and technologies to maintain the security of all personal data from the point of the determination of the means for processing and point of data collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

We will maintain data security by protecting the ***confidentiality, integrity*** and ***availability*** of the personal data, defined as follows:

- A. **Confidentiality** means that only people who are authorised to use the data can access it.
- B. **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.

C. **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on Koinonia John the Baptist Ireland's central computer system instead of individual PCs.

Security procedures include:

- **Entry controls:** Any stranger seen in entry-controlled areas should be reported.
- **Secure lockable desks and cupboards:** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- **Data minimisation**
- **Pseudonymisation and encryption of data**
- **Methods of disposal:** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
- **Equipment:** Personnel must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

Data Breach

The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. Koinonia John the Baptist Ireland undertakes to comply with this duty within 72 hours of becoming aware of the breach, where feasible.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Koinonia John the Baptist Ireland will inform those individuals without undue delay.

Koinonia John the Baptist Ireland will keep a record of any personal data breaches, regardless of whether or not it is necessary to notify the relevant supervisory authority.

Data Sharing

Transferring Personal Data Outside of the EEA

We may transfer any personal data we hold to a country outside the UK or European Economic Area ('EEA') or to an international organisation, provided that one of the following conditions applies:

- A. The country to which the personal data are transferred ensures an **adequate level of protection** for the data subjects' rights and freedoms.
- B. The data subject has given his **consent**.
- C. The transfer is **necessary** for one of the reasons set out in the Act, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject.
- D. The transfer is **legally required** on important public interest grounds or for the establishment, exercise or defence of legal claims.
- E. The transfer is **authorised by the relevant data protection authority** where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

Subject to the requirements above, personal data we hold may also be processed by personnel operating outside the EEA who work for us or for one of our suppliers. Those personnel may be engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

Disclosure and Sharing of Personal Data

We may share personal data we hold with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

Subject Access Requests

Individuals must make a formal request for information we hold about them. Personnel who receive a request should forward it to the Data Protection Officer immediately.

When receiving telephone enquiries, Koinonia John the Baptist Ireland will only disclose personal data held on its systems if the following conditions are met:

1. We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
2. We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

Where a request is made electronically, data will be provided electronically where possible.

Personnel will refer a request to their line manager for assistance in difficult situations.

Changes to this Policy

Koinonia John the Baptist Ireland reserves the right to change this policy at any time. Where appropriate, changes will be notified by mail or email.



Koinonia John the Baptist Ireland

PRIVACY NOTICE – PERSONNEL DATA

Dear Brother/Sister/Colleague,

We wish to inform you about the steps Koinonia John the Baptist Ireland has taken to comply with the EU's General Data Protection Regulation (GDPR), effective from 25 May 2018.

The aim of the GDPR is to protect individuals from privacy and data breaches in an increasingly data-driven world. As a result, this privacy notice explains how Koinonia John the Baptist Ireland will use the personal data it collects from you.

How your information will be used

1. As your employer, Koinonia John the Baptist Ireland needs to keep and process information about you for normal human resource purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the charity and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the ministry contract, to comply with any legal requirements, pursue the legitimate interests of Koinonia John the Baptist Ireland and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. In pursuit of Koinonia John the Baptist Ireland's charism, of being a community at the service of the New Evangelisation, we may sometimes need to process your data to pursue our legitimate charity interests, for example to prevent fraud,

administrative purposes or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.

3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager or pastor, or in some cases, external sources, such as referees.

4. The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

5. You will, of course, inevitably be referred to in many charity documents and records that are produced by you and your colleagues in the course of carrying out your duties and the ministry of the charity. You should refer to the Data Protection Policy which is included in your Employee Folder, General Organisational Policies and Rules.

6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and charity sick pay.

7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are

processing data based on your consent, you have the right to withdraw that consent at any time.

8. In addition, we monitor computer and telephone / mobile telephone use, as detailed in the Employee Handbook, General Organisation Policies & Rules and Information Technology Systems Policy. We also keep records of your hours of work by retaining weekly programming sheets completed by the ministry team and verified by the pastor.

9. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you or to allow us to pursue our legitimate charity interests, for instance we may need to pass on certain information to HMRC, our external charity accountant or legal / HR advisors or pension schemes.

10. We may transfer information about you to other affiliate charities for purposes connected with your employment or the management of the charity's ministry and administration.

11. In limited and necessary circumstances, your information may be transferred outside of the European Economic Area (EEA) or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards including the following, to ensure the security of your data, ie paper records in these categories are kept in lockable cupboards or drawers when not in use; a clear desk policy is recommended, where files and other paper documentation are locked away at the end of the working day; electronic records in these categories are kept password protected within databases or stored in a shared drive that the relevant people have access to; portable storage devices should be encrypted or not used at all; antivirus software will be kept up to date on all desktops and laptops and any mobile devices will be password protected; email is not a secure system, so confidentiality cannot be assured for any information sent via email.

12. The personal data we hold on our employees falls into a variety of categories for example financial records, health and safety records and employment records. Some of these we need to retain for a statutory period and others we retain for set

periods for legitimate reasons. Details of our retention periods are contained at the end of this document.

13. If in the future we intend to process your personal data for a purpose other than that which it was collected for we will provide you with information on that purpose and any other relevant information.

Your rights

14. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

15. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

16. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 2018 with regard to your personal data.

Identity and contact details of data controller

17. **Cathy Gilligan** (Company Secretary - Koinonia John the Baptist Ireland) is the controller of data for the purposes of the DPA 2018 and GDPR.

18. If you have any concerns as to how your data is processed you can contact: Cathy Gilligan, Company Secretary.

HR Records – Retention Periods

- Remuneration related records - 6 years for public limited companies
- Accident Books / Accident Records / Reports – 3 years from the date of the last entry
- Accounting Records – 6 years for public limited companies
- HMRC Approvals – permanently
- Income Tax / NI Returns / Income Tax Returns / Correspondence with HMRC – 3 full tax years
- National Minimum Wage Records - 3 full tax years
- Retirement Benefits Schemes – 6 years from the end of the scheme year in which the event took place.
- Statutory Maternity Pay records – 3 years after the end of the tax year in which the maternity period ends.
- Pay records – 6 years
- Money purchase details – 6 years after transfer or value taken.
- Pensioners records – 12 years after benefit ceases
- Statutory sick pay records – 6 years after employment ceases

Employment records

- Records relating to children and young adults – until the person reaches the age of 21
- Working time records – 2 years from date on which they were made
- Application forms / Interview Notes (for unsuccessful candidates) – 1 year
- Fair employment monitoring records – 3 years
- Parental leave – 18 years from the birth of the child
- Pension scheme investment policies – 12 years from the ending of any benefit payable under the policy
- Personnel files and training records – 6 years after employment ceases
- Redundancy records – 6 years from the date of redundancy

- Senior management records – permanently
- Works council minutes - permanently

In addition

Relevant documentation, as listed above, will be retained for longer periods in accordance with stipulations set by Koinonia John the Baptist Ireland funders

1. Education Authority Funding

The Organisation shall maintain current and accurate records of all personnel who are engaged by the Organisation in the provision of the Services. These records shall be retained for at least 1 year after the termination of Funding Agreements.

The Company Secretary will hold responsibility for documentation retention and documents will be retained within Koinonia John the Baptist Ireland's filing systems at its Community Hub (Oasis), 'The Braid', 189 Carnlough Road, Broughshane, Ballymena, County Antrim. BT43 7JW.



Koinonia John the Baptist Ireland

PRIVACY NOTICE

MEMBERS, VOLUNTEERS & PLACEMENT STUDENTS

Dear Brother/Sister (Member/Volunteer/Professional Placement Student)

We wish to inform you about the steps Koinonia John the Baptist Ireland has taken to comply with the EU's General Data Protection Regulation (GDPR), effective from 25 May 2018.

The aim of the GDPR is to protect individuals from privacy and data breaches in an increasingly data-driven world. As a result, this privacy notice explains how Koinonia John the Baptist Ireland will use the personal data it collects from you.

How your information will be used

1. Koinonia John the Baptist Ireland needs to keep and process information about you in order to support your involvement in our ministry and service, as well as any payments to you, if applicable. The information we hold and process will be used for our ministry, management and administrative use only. We will keep and use it to enable us to run the charity and manage our relationship with you effectively, lawfully and appropriately. This includes using information to enable us to make payments to you, to comply with any legal requirements, pursue the legitimate interests of Koinonia John the Baptist Ireland and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. We only collect basic personal data necessary for effective ministry and service. This does not include any special types of information or location based information. This does however include name, address, email etc.

3. Where we process personal data relating to the diversity categories protected by Section 75 of the Northern Ireland Act (1998) we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

4. Much of the information we hold will have been provided by you when you became a member, volunteer, trustee, or placement student of Koinonia John the Baptist Ireland or submitted your Curriculum Vitae if interested in casual work, but some may come from other internal sources, such as your coordinator/manager, or in some cases, external sources, such as referees.

5. The sort of information we hold may include your Curriculum Vitae, evidence of your qualifications and references and correspondence with or about you.

6. Koinonia John the Baptist Ireland has a Data Protection policy in place to oversee the effective and secure processing of your personal data. This policy is available on its website or upon request.

7. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you or to allow us to pursue our legitimate business interests, for instance we may need to pass on certain information to HMRC, Companies House, the Charity Commission for NI or our external charity accountant or legal advisors.

8. In limited and necessary circumstances, your information may be transferred outside of the UK and European Economic Area (EEA) or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards including the following, to ensure the security of your data, ie paper records in these categories are kept in lockable cupboards or drawers when not in use; a clear desk

policy is recommended, where files and other paper documentation are locked away at the end of the working day; electronic records in these categories are kept password protected within databases or stored in a shared drive that the relevant people have access to; portable storage devices should be encrypted or not used at all; antivirus software will be kept up to date on all desktops and laptops and any mobile devices will be password protected; email is not a secure system, so confidentiality cannot be assured for any information sent via email.

9. Some of the data we hold about you we need to retain for a statutory period and others we retain for set periods for legitimate reasons. Details of our retention periods are contained at the end of this document.

10. If in the future we intend to process your personal data for a purpose other than that which it was collected for we will provide you with information on that purpose and any other relevant information.

Your rights

11. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

12. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

13. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 2018 with regard to your personal data.

Identity and contact details of data controller

14. **Cathy Gilligan** (Company Secretary - Koinonia John the Baptist Ireland) is the controller of data for the purposes of the DPA 2018 and GDPR.

15. If you have any concerns as to how your data is processed you can contact: **Cathy Gilligan** (Company Secretary - Koinonia John the Baptist Ireland).

Retention Periods

Remuneration related records

- **Accident Books / Accident Records / Reports** – 3 years from the date of the last entry
- **Accounting Records** – 6 years for public limited companies
- **HMRC Approvals** – permanently
- **Income Tax / NI Returns / Income Tax Returns / Correspondence with HMRC** – 3 full tax years

In addition

Relevant documentation, as listed above, will be retained for longer periods in accordance with stipulations set by Koinonia John the Baptist Ireland funders, as detailed below.

EDUCATION AUTHORITY FUNDING

The Organisation shall maintain current and accurate records of all personnel who are engaged by the Organisation in the provision of the Services. These records shall be retained for at least 1 year after the termination of Funding Agreements.

The Company Secretary will hold responsibility for documentation retention and documents will be retained within Koinonia John the Baptist Ireland's filing systems at its Community Headquarters at 'The Braid', 189 Carnlough Road, Broughshane, Ballymena, County Antrim. BT43 7JW.



Koinonia John the Baptist Ireland

PRIVACY NOTICE

MINISTRY PARTICIPANTS

Dear Programme Participant,

As an organisation who ministers with children, young people and vulnerable adults, Koinonia John the Baptist Ireland regularly asks young people and adults for information about themselves and those in their care. It is Koinonia John the Baptist Ireland's responsibility to ensure the information it holds about others is held safely and securely.

We wish to inform you about the steps Koinonia John the Baptist Ireland has taken to comply with the EU's General Data Protection Regulation (GDPR), effective from 25 May 2018.

The aim of the GDPR is to protect individuals from privacy and data breaches in an increasingly data-driven world. As a result, this privacy notice explains how Koinonia John the Baptist Ireland will use the personal data it collects from you.

What we need

Koinonia John the Baptist Ireland will be known as the 'Controller,' of the personal data you provide to us. We only collect basic personal data about you which does not include any special types of information or location based information. This does however include name, address, email etc.

Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Why we need it

We need your basic personal data to record your participation in our ministry programmes or services, and to report to our commissioners and funders on the numbers and experiences of our participants and also to register you for accreditation with the appropriate awarding organisation (eg. Youth Link: NI, Volunteer Now), if applicable. We will not collect any personal data from you we do not need to.

What we will do with it

All the personal data we process is processed by our personnel in Koinonia John the Baptist Ireland and for the purposes of IT hosting and maintenance this information is located locally at the charity headquarters, or on servers within the European Union. No third parties have access to your personal data unless the law allows them to do so.

Koinonia John the Baptist Ireland has a Data Protection policy in place to oversee the effective and secure processing of your personal data. This policy is available upon request.

How long we keep it

The data we hold on our Programme participants falls into a variety of categories for example incentive payment records, basic personal data (name, address, contact details). Some of these we need to retain for a statutory period and others we retain for set periods for legitimate reasons. Details of our retention periods are contained at the end of this document.

Your rights

1. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

2. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

3. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of data controller

4. **Cathy Gilligan** (Company Secretary - Koinonia John the Baptist Ireland) is the controller of data for the purposes of the DPA 2018 and GDPR.

If you have any concerns as to how your data is processed you can contact: **Cathy Gilligan** (Company Secretary - Koinonia John the Baptist Ireland).

Retention Periods

Payroll related records

- **Accident Books / Accident Records / Reports** – 3 years from the date of the last entry
- **Accounting Records** – 6 years for public limited companies
- **HMRC Approvals** – permanently
- **Income Tax / NI Returns / Income Tax Returns / HMRC Correspondence** – 3 full tax years
- **Pay records** – 6 years

Awarding organisation records

- OCN NI – 3 years
- Volunteer Now – 3 years

In addition

Relevant documentation, as listed above, will be retained for longer periods in accordance with stipulations set by Koinonia John the Baptist Ireland funders, as detailed below.

1. Education Authority Funding

The Organisation shall maintain current and accurate records of all personnel who are engaged by the Organisation in the provision of the Services. These records shall be retained for at least 1 year after the termination of Funding Agreements.

The Company Secretary will hold responsibility for documentation retention and documents will be retained within Koinonia's filing systems at its community headquarters (Oasis) at 'The Braid', 189 Carnlough Road, Broughshane, Ballymena, County Antrim. BT43 7JW.