

General Data Protection Regulation (GDPR)

CSEAS Statement

The CSEAS recognises the need to treat all client data in an appropriate and lawful manner. We are committed to complying fully with the Data Protection Acts 1988 – 2018 and the EU General Data Protection Regulation 2016/679 (GDPR).

GDPR requires CSEAS to inform you of

- ✓ The types of data we hold on you
- ✓ The purpose for which it is used
- ✓ Your rights in relation to how it is processed
- ✓ Your right of access

In the course of our engagements with clients, data is collected mainly from you and held in the CSEAS. All data collected is stored securely.

Do we share your personal data with anyone?

Your personal data is **not** shared outside of the CSEAS unless

- ✓ You have given your consent
- ✓ The confidentiality exceptions below apply

Exceptions to Confidentiality

- Life-threatening situations to the individual, other parties or the public
- Where there is a statutory responsibility to report
- Where required by a court or legal process to do so
- Where non-disclosure of information could compromise the CSEAS
- Where the CSEAS becomes aware of a breach in criminal law, disclosure may be necessary.

Who controls the use of your data?

The CSEAS is a shared service within the Department of Public Expenditure and Reform (DPER). DPER is therefore the Data Controller.

CSEAS Contact Details:

Tel: 0761 000 030

email: cseas@per.gov.ie

website: www.cseas.per.gov.ie

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Types of Data collected

Biographical Data – Name, address, phone number, Department, gender, age range, family relationships, work location, GP name

Interactions with the CSEAS – A record is kept of all your interactions with the CSEAS

Your agreement to process your data – we require you to agree to the processing of your data

Management referrals – CSEAS accepts management referrals where

- There is a threat to life
- Where the referral has been recommended by the Office of the Chief Medical Officer

The categories of data we collect and process, our legal basis for processing and for how long we retain that data are set out in Appendix 1 of this notice.

The purpose for processing your data is

- To provide you with service
- To ensure that the core business of the CSEAS can be delivered effectively
- To ensure continuity of service to CSEAS service users
- To collate statistics for analysis of trends (anonymised)

Lawful basis for processing of your data

Under GDPR we require your consent to process your personal and special category data – except in those cases where exceptions to confidentiality apply. When you agree to the processing of your data you are free to withdraw that consent at any time.

Please note that if you withdraw consent we will not be in a position to provide you with service.

Your rights

- to receive a copy of the personal data we hold that we hold about you
- to request that any inaccurate data that is held about you is corrected or, if we have incomplete information, you may request that we update the information such that it is complete
- to request, in certain circumstances, that we erase your personal data
- to restrict processing
- to have your personal information sent directly to yourself or to another organisation
- to object to the processing of your personal data

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Queries

Any queries regarding GDPR and the CSEAS can be directed to the CSEAS Manager or the CSEAS Records Officer at 0761 000 030.

Complaints

If you are unhappy with any aspect of how the CSEAS processes your data, you can raise this with the CSEAS or with the Data Protection Officer for DPER:

Data Protection Officer
Department of Public Expenditure and Reform
Government Buildings
Upper Merrion Street
Dublin 2
D02 R583

You also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with how the CSEAS is processing your personal data.

Subject Access Request (SAR)

You have the right to request a copy of your personal data that is held by the CSEAS. You can do this by making a Subject Access Request to the Data Protection Officer for the Department of Public Expenditure & Reform.

Review of this Statement

This statement will be reviewed periodically.

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CSEAS Personal Data Inventory

<i>Categories of personal data and data subjects</i>	<i>Elements of personal data included within each data category</i>	<i>Purposes for which personal data is processed</i>	<i>Legal basis for processing personal data</i>	<i>Special categories of personal data</i>	<i>Legal basis for processing special categories of personal data</i>	<i>Retention period</i>
Client Records (electronic)	<ul style="list-style-type: none"> Name Address Phone number Session details i.e. notes of one-to-one sessions, phone-calls, texts and emails Appointment details – electronic and hard copy Consent Forms Referrals Information Only Requests Enquiries to central CSEAS email address Phone Log detailing calls to central CSEAS phone number Department Age range 	<ul style="list-style-type: none"> To provide services to the client To take steps to protect the client’s (or another individual’s) health, safety and wellbeing To comply with any legal reporting obligation To meet the data controller’s legitimate interests as follows: <ul style="list-style-type: none"> To ensure effective delivery of core business To ensure continuity of service to CSEAS clients To collate statistics for analysis and trends (anonymised) To enable the support/ defence of legal proceedings 	<ul style="list-style-type: none"> Consent of data subject Protection of the vital interests of the data subject or of another natural person To comply with a legal obligation to which the data controller is subject For the purposes of the legitimate interests pursued by the data controller, taking into account the fundamental rights and freedoms of the data subject (as identified in the purposes of processing column) 	<ul style="list-style-type: none"> Ethnic or racial origin Political opinion, Religious or Philosophical beliefs Trade Union membership Mental or physical health Sexual life or orientation 	<ul style="list-style-type: none"> Explicit Consent of the data subject Protect vital interests of the data subject or of another natural person For the purposes of carrying out the legal obligations of the data controller For the purposes of establishing, exercising or defending legal claims 	10 years

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Critical Incident Management Records (electronic)	<ul style="list-style-type: none"> Names Addresses Phone numbers Texts Emails Documents Reports 	<ul style="list-style-type: none"> To provide services to the client To take steps to protect the client's (or another individual's) health, safety and wellbeing To comply with any legal reporting obligation To meet the data controller's legitimate interests as follows: <ul style="list-style-type: none"> To collate statistics for anonymised reporting To record accurate details of CSEAS involvement in workplace critical incidents To enable the support/ defence of legal proceedings 	<ul style="list-style-type: none"> Consent of data subject Protection of the vital interests of the data subject or of another natural person To comply with a legal obligation to which the data controller is subject For the purposes of the legitimate interests pursued by the data controller, taking into account the fundamental rights and freedoms of the data subject (as identified in the purposes of processing column) 	<ul style="list-style-type: none"> Ethnic or racial origin Political opinion, Religious or Philosophical beliefs Trade Union membership Mental or physical health Sexual life or orientation 	<ul style="list-style-type: none"> Explicit Consent of the data subject Protect vital interests of the data subject or of another natural person For the purposes of carrying out the legal obligations of the data controller For the purposes of establishing, exercising or defending legal claims 	10 years

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