

 Policy & Procedure

Personal Data Handling

**October 2020**

Review Date: October 2021

Date of Trustee Approval: 7 October 2020

Table of Contents

[1. Introduction 3](#_Toc486849327)

[2. About this document 3](#_Toc486849328)

[3. What constitutes a data correction request? 3](#_Toc486849329)

[4. Who do we need to notify immediately? 3](#_Toc486849330)

[5. Procedure 3](#_Toc486849331)

# Introduction

The Society of the Holy Child Jesus stores personal information in respect of Employees, Residents, Sisters and other third parties in order to conduct its lawful business. We have a duty to ensure this data is correct and retained only when necessary. An employee, resident, sister or other 3rd party may request that data is corrected or deleted, and this must be carried out in a timely manner.

Corrections, amendments or requests for removal apply to electronic and paper based data.

# About this document

This document should be read by all staff. Sections 3 and 4 relate to the actions to be taken by all staff. The remaining sections relate to the actions required by management.

# What constitutes a data correction request?

Any request, formally or informally to amend, correct or remove personal data. Personal Data is any information relating to an individual that can identify, or assist with the identification of the individual.

# Who do we need to notify immediately?

In the event a request is received, you must inform the Data Controller immediately. Management will evaluate the request and take the following steps.

# Procedure

1. Acknowledge the request. The individual must be formally notified that the request has been received and will be dealt with. As part of this notification, provide a realistic estimate of when this will take place.
2. Determine where the data is stored. Determine in which systems and electronic stores the personal data for the individual is stored. Also determine if this data is likely to be held on paper in the province office, in archives or within communities.
3. If the request is for removal/deletion of data, proceed at Section 6.
4. If the request is for correction of data, proceed at Section 7.

# Data Deletion/Removal

The request for deletion or removal can be refused if the following criteria are met:

* The Society of the Holy Child Jesus needs to retain the data in order to conduct its lawful business.
* The Society of the Holy Child Jesus needs to retain the data in order to meet the requirements of supervising authorities or legislation in respect of maintaining historical records.

If either of the above criteria are met, then the individual making the request must be formally notified why the request has been refused. No further action is required.

If the criteria are not met, then the data must be removed and/or destroyed. Consult the Data identification document to determine where the data is held. In the case of electronic records, each system must be accessed and the relevant records removed. In the case of paper documents, files held within the province office or archive area will need to be checked and any data relating to that individual must be removed and destroyed.

# Data Correction

Consult the Data identification document to determine where the data is held. In the case of electronic records, each system must be accessed and the relevant records amended. In the case of paper documents, files held within the province office and the province archive area will need to be checked and any data relating to that individual must be corrected.

Policy Prepared by Alan Budd for Field Lane

Adapted for SHCJ 2018