Data Protection and Privacy Policy

Ratified by the NI Youth Forum Executive Committee on 8th November 2025.

NI YOUTH FORUM DATA PROTECTION AND PRIVACY POLICY

TABLE OF CONTENTS:

No.	Section	Page Number
1	INTRODUCTION	3
2	WHAT DO ALL THE DEFINED TERMS IN THIS POLICY MEAN	3
3	WHAT IS THE SCOPE OF THIS POLICY	4
4	THE PRINCIPLES OF DATA PROTECTION	4
5	PRIVACY BY DESIGN	5
6	NI YOUTH FORUM IS A DATA CONTROLLER	5
7	WHO NI YOUTH COLLECTS PERSONAL DATA FROM	6
8	WHERE DOES NI YOUTH FORUM COLLECT DATA FROM	7
9	HOW NI YOUTH FORUM WILL USE THE PERSONAL DATA IT HOLDS AND WHAT IS THE LAWFUL BASIS FOR DOING SO	9
10	WHO NI YOUTH FORUM WILL DISCLOSE PERSONAL DATA TO	11
11	OTHER TYPES OF DATA WE HOLD	12
12	WHERE NI YOUTH FORUM STORES THE DATA IT COLLECTS	13
13	HOW LONG DOES NI YOUTH FORUM RETAIN THE DATA IT COLLECTS	14
14	ACCESSNI: DISCLOSURE APPLICATIONS AND DISCLOSURE INFORMATION	15
15	USE OF CCTV	16
16	THE RIGHTS OF THE DATA SUBJECT	16
17	WHAT HAPPENS IF A DATA SUBJECT NO LONGER WANTS NI YOUTH FORUM TO PROCESS PERSONAL DATA ABOUT THEM	17
18	WHAT SECURITY PROCEDURES NI YOUTH FORUM HAS IN PLACE	18
19	DATA BREACH PROCEDURE	19
20	COMPLAINTS PROCEDURE	20
21	NOTIFICATION OF CHANGES TO THIS POLICY	20
22	BREACHES OF THIS POLICY AND DISCIPLINARY PROCEDURES	20

NI YOUTH FORUM DATA PROTECTION AND PRIVACY POLICY

(1) INTRODUCTION

1.1 The purpose of this policy is to ensure that where necessary the NI Youth Forum complies with the requirements of the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018.

1.2 This policy outlines our procedures relating to obtaining, maintaining, processing and destroying personal data.

1.3 In order to provide our services, we may need to process personal data from time to time.

1.4 By personal data, we mean information about someone that can be used to identify them.

1.5 This policy outlines how we will use and process the personal data we hold.

1.6 NI Youth Forum has a duty of care to ensure that all our practices are safe, compliant and protect personal data.

1.7 NI Youth Forum are committed to handling data safely and our processes are designed to protect those whose personal data we hold.

1.8 NI Youth Forum holds personal data about its employees, volunteers, young people, members, stakeholders, partners and other individuals for a variety of documented, legitimate and lawful proposes.

1.9 The NI Youth Forum Data Protection Officer can be contacted at info@niyf.org / 02890331990 / 68 Berry Street, Belfast, BT1 1FJ.

(2) WHAT DO ALL THE DEFINED TERMS IN THIS POLICY MEAN

2.1 Throughout this policy you'll see a lot of defined terms. Where possible, we have tried to define them as we go, but we thought it might be useful to have a glossary at the start for you. Anywhere in this notice you see the following terms, they'll have the following meanings:

2.1.1 Controller is a legal term set out in the UK GDPR, it means the party responsible for deciding what personal data to collect and how to use it.

2.1.2 Data subject means the individual who can be identified from the personal data.

2.1.3 Personal data means data which can be used to identify an individual. This could be a name and address, or it could be a number of details which when taken together make it possible to work out who the information is about.

2.1.4 Processor is another legal term set out in the UK GDPR, it means the party who has agreed to process personal data on behalf of the controller.

2.1.5 Special categories of data mean details about an individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, genetic and biometric data etc. There will be more information below regarding special categories data.

(3) WHAT IS THE SCOPE OF THIS POLICY

3.1 You must read this policy because it gives important information about:

3.1.1 the data protection principles which NI Youth Forum must comply with;

3.1.2 what is meant by personal data and special category data;

3.1.3 how we gather, use and (ultimately) delete personal data and special category data in accordance with the data protection principles;

3.1.4 where more detailed privacy information can be found, e.g. about the personal data we gather and use about data subjects, how it is used, stored and transferred, for what purposes, the steps taken to keep that information secure and for how long it is kept;

3.1.5 your rights and obligations in relation to data protection; and

3.1.6 the consequences of a failure to comply with this policy.

(4) THE PRINCIPLES OF DATA PROTECTION

4.1 UK GDPR sets out key principles that organisations must follow when handling personal data. NI Youth Forum commits to these principles. This means that any personal data we hold will be:

4.1.1 Used lawfully, fairly and transparently – we will be clear about what we are doing with your information and why.

4.1.2 Collected for specific purposes – we will only use your information for the reasons we told you about, unless the law allows us to use it for other compatible purposes such as research or archiving in the public interest.

4.1.3 Limited to what is necessary – we will only collect the information we actually need.

4.1.4 Accurate and up to date – we will take steps to correct or delete information that is wrong.

4.1.5 Kept for no longer than necessary – we will only keep your information for as long as we need it and then securely delete or anonymise it, unless the law allows us to keep it longer.

4.1.6 Kept secure – we will use appropriate technical and organisational measures to protect your information from loss, misuse or unauthorised access.

4.1.7 Accountability – we take responsibility for complying with data protection law and can show how we do this through our policies, procedures and training.

(5) PRIVACY BY DESIGN

5.1 NI Youth Forum is committed to "privacy by design and by default". This means we build privacy and data protection into everything we do, from the earliest planning stages of new projects, systems, or processes.

5.2 Whenever we introduce a new way of collecting or using personal information — or make a significant change to how we already do it — we will carefully assess the impact on people's privacy.

5.3 This includes completing a Data Protection Impact Assessment (DPIA) where the processing is likely to be high risk.

5.4 A DPIA will:

5.4.1 explain how and why personal information will be used;

5.4.2 check whether using the information in this way is necessary and proportionate;

5.4.3 consider any risks to individuals; and

5.4.4 set out the steps we will take to reduce those risks and comply with the law.

5.5 DPIAs will be reviewed regularly and carried out whenever there is a major change to a project, at the request of the Data Protection Officer, or whenever the sensitivity or volume of data means extra care is needed.

(6) NI YOUTH FORUM IS A DATA CONTROLLER

6.1 NI Youth Forum is a data controller for the data that we collect.

6.2 Being the data controller means that we are legally responsible for deciding what personal data we collect, how we use it, and how we keep it safe.

6.3 We must ensure that all personal data is handled in line with data protection law. This includes:

6.3.1 only collecting information we need,

6.3.2 being clear about why we are collecting information

6.3.3 making sure it is accurate and kept up to date,

6.3.4 keeping it secure, and

6.3.5 respecting your rights under UK data protection law.

(7) WHO NI YOUTH COLLECTS PERSONAL DATA FROM

7.1 NI Youth Forum collects personal data about the following groups of people (known as data subjects):

Table 1: Data Subjects

DATA SUBJECTS	DESCRIPTION
Project Participants	Any young person (aged 11–30) currently engaged in NI Youth Forum programmes, events, training, or workshops. This includes previous participants who are no longer active.
Individual Members	Young people aged 11–30, resident in Northern Ireland, who have registered as individual members.
Affiliate Members	Young people aged 11–30, living outside Northern Ireland, who have joined NI Youth Forum to support its aims and/or participate in relevant projects, campaigns, or events.
Organisational Members	Youth councils, forums, clubs, schools, community groups, or other organisations that promote youth participation and are formally members of NI Youth Forum.
Executive Committee Members, Trustees and Advisors	Elected members of the Executive Committee (aged 11–25), some of whom are also legal trustees if over 18. Includes co-opted members and advisors.
Supporters	Individuals (not members) who engage with NI Youth Forum by signing up for newsletters, following campaigns, attending events, or otherwise supporting its work.
Adult Contacts	Parents/guardians of young people, emergency contacts, referees, or other responsible adults whose details are provided for safeguarding or operational purposes.
Staff, Casual Workers, Placement Students, Candidates and Volunteers.	Paid employees and volunteers who work with NI Youth Forum, including applicants for staff/volunteer roles. Unsuccessful candidate data is held for 1 year.
Funders, Partners, and External Stakeholders	Contact persons within funding bodies, partner organisations, regulators, venues, training providers, etc., where personal data is

	processed to deliver NI Youth Forum's services and meet legal obligations.
Suppliers	Individuals, organisations and companies that NI Youth Forum exchanges goods and services with.
Donations, fundraising and sponsorship	People who donate to, raise funds for or support NI Youth Forum through sponsorship or 'in kind' support.
Event attendees	This includes those who attend NI Youth Forum events who aren't previous members.

(8) WHERE DOES NI YOUTH FORUM COLLECT PERSONAL DATA FROM

8.1 Depending on how you interact with us, we may collect personal data from different sources. Sometimes we collect information directly from you (for example when you complete a consent form or sign up as a member). Other times, we may receive information about you from trusted third parties such as parents/guardians, partner organisations, or statutory bodies.

8.2 We will always explain why we need your information, and we only collect what is necessary to deliver our services, meet our legal obligations, and keep people safe.

8.3 The table below sets out the main sources of personal data we collect, and which groups of people this applies to.

Table 2: Where does NI Youth Forum collect personal data from

Data Subject	Types of Personal Data Collected	Sources of Data
Project Participants	Name; age; date of birth; address/postcode; phone/email; emergency contacts; parent/guardian details; medical and dietary needs; disabilities/accessibility needs; GP details; safeguarding records; ability to swim (if relevant); consent forms; images/videos (including CCTV); participation records; feedback forms; demographic/equality monitoring info; national insurance numbers; qualification history/ record; employment/ education history; unique learning numbers via the Learning Records Service	Direct from young person (forms, surveys, online, in person); parents/guardians; partner organisations (schools, youth groups, funders); health & social care professionals; statutory agencies (e.g. Gateway Social Services, PSNI, NIHE); publicly available sources; CCTV; email/phone
Individual Members	Same as above, plus membership category, membership history	Direct from member; parents/guardians (if under

		18); NIYF membership forms; partner orgs; public sources
Affiliate Members	Same as project participants, plus affiliate membership details	Direct from member; partner orgs; public sources
Organisational Members	Organisation name; type; registration details; postal/email addresses; phone; key contact details; organisational representatives; membership history; surveys/needs assessments	Direct via membership application; partner/funder referrals; Companies House; organisational websites; surveys
Executive Committee Members, Trustees, Advisors	Name; age; DOB; address; phone/email; NI Youth Forum membership details; governance role; trustee records; AccessNI checks; safeguarding declarations; training/skills records; participation history	Direct from individual; NIYF membership records; AccessNI; Charity Commission NI; Companies House; training providers; publicly available sources
Supporters	Name; phone/email; postal address; communication preferences; consent forms; event attendance records; survey responses; images/videos from events/campaigns	Direct via sign-ups, events, online; partner orgs; publicly available sources; newsletter platforms; social media
Adult Contacts	Name; relationship to young person; phone/email/address; safeguarding or referral info if relevant	Provided by participant/member; directly by parent/guardian/referee; professional referrals; safeguarding partners
Staff, Casual Workers, Placement Students, Candidates and Volunteers.	Name; address; DOB; phone/email; CV/employment history; education; references; AccessNI checks; equality monitoring; emergency contacts; training records; payroll/HR info; safeguarding data where relevant	Direct from applicant/employee/volunteer; referees; AccessNI; funders/regulators; professional bodies
Funders, Partners and External Stakeholders	Name; organisation; role; phone/email; postal address; communication preferences; correspondence records	Direct from funder/partner; contracts/agreements; publicly available sources (websites, Companies House)
Suppliers	Name of contact; organisation; address; email/phone; bank/payment details	Direct from supplier; contracts/invoices; publicly available sources
Donors, Fundraisers and Sponsors	Name; organisation (if corporate); contact details; donation/fundraising/sponsorship	Direct from donor/fundraiser/sponsor; fundraising platforms; event

	records; Gift Aid status; consent/preferences	sign-ups; public sources (companies, websites)
Event Attendees	Name; organisation; contact details; survey data; images/video footage; medicical and accessability requirments.	Direct from individual from attendance logs, Eventbrite or other online forms,

(9) HOW NI YOUTH FORUM WILL USE THE PERSONAL DATA IT HOLDS AND WHAT IS THE LAWFUL BASIS FOR DOING SO

9.1 NI Youth Forum collects and uses personal data so that we can carry out our work as a charity. Under data protection law, we must have a lawful reason (called a "lawful basis") every time we use personal data.

9.2 The main ways we use personal data are to:

9.2.1 deliver our programmes, projects, and events;

9.2.2 manage our membership and governance structures;

9.2.3 meet legal, safeguarding, and funding requirements;

9.2.4 communicate with members, supporters, funders, and partners;

9.2.5 recruit and support staff and volunteers;

9.2.6 promote our work through newsletters, campaigns, and events, and;

9.2.7 assess risk.

9.3 The lawful basis we rely on may include:

9.3.1 Consent – when individuals agree that we can use their data for a particular purpose.

9.3.2 Contract – when data is needed to deliver our services or manage a membership agreement.

9.3.3 Legal obligation – when we must process data to meet legal or regulatory requirements (for example, safeguarding, employment, or reporting to funders and HMRC).

9.3.4 Vital interests – when data must be used to protect someone's life (for example, emergency medical information or safeguarding).

9.3.5 Legitimate interests – when processing is necessary for NI Youth Forum to operate effectively as a charity, in ways that people would reasonably expect and that do not unfairly impact them. This includes monitoring and evaluation, administration, keeping records, and promoting our work.

9.3.6 Public task – where we deliver publicly funded programmes or services on behalf of statutory bodies.

Table 3: How NI Youth Forum will use personal data

Purpose	What we do	Who it applies to	Lawful basis
Running programmes, projects, and events	Collect and use information needed to run activities safely and effectively (e.g. names, contacts, emergency details, medical needs, consent forms, participation records, evaluations)	Project participants, individual/affiliate members	Contract, Consent, Legitimate interests
Membership and governance	Administer memberships, manage voting rights, committee/board roles, and organisational governance	Individual members, Affiliate members, Organisational members, Executive Committee/Trustees	Contract, Legitimate interests
Safeguarding and child protection	Record and share information where necessary to keep young people and others safe, including with statutory bodies where required	Participants, members, staff, volunteers	Legal obligation, Vital interests
Communication	Keep in touch with members, supporters, partners, and funders through updates, newsletters, campaigns, consultations, or event invites	Members, supporters, funders, partners	Consent, Legitimate interests
Recruitment and HR	Recruit and support staff and volunteers, manage applications, payroll, references, training, AccessNI checks, and HR records	Staff, volunteers, applicants	Contract, Legal obligation
Fundraising and publicity	Manage donations, sponsorships, fundraising campaigns, Gift Aid, and promote our work (including images/videos and campaign materials)	Donors, fundraisers, sponsors, supporters, members	Consent, Legitimate interests, Legal obligation (for Gift Aid)
Administration and records	Keep internal records, evaluate programmes, handle complaints, meet reporting	All data subjects	Legitimate interests,

	requirements for funders/regulators, and maintain accountability		Legal obligation
Partnerships and external engagement	Work with funders, statutory bodies, and partner organisations to deliver programmes, share learning, and meet reporting duties	Funders, partners, external stakeholders	Contract, Legal obligation, Public task

(10) WHO NI YOUTH FORUM WILL DISCLOSE PERSONAL DATA TO

10.1 NI Youth Forum does not sell personal data to third parties. We only share personal data where it is necessary, lawful, and proportionate to do so.

10.2 Depending on the circumstances, we may share personal data with trusted third parties, such as partner organisations, funders, statutory bodies/and or Government departments, or service providers. We will always seek to limit the amount of data shared to what is strictly required and, where possible, anonymise information.

10.3 The table below sets out the main groups of people we may disclose personal data to, the types of data that might be transferred and the reasons why.

Table 4: Who NI Youth will disclose personal data to

Who data may be shared with	Examples of personal data shared	Why we share it
Parents/guardians, emergency contacts	Names, contact details, medical/safeguarding info if relevant	To keep participants safe, especially young people under 18
Partner organisations (schools, youth groups, community organisations, delivery partners)	Names, contact details, participation details	To run joint programmes, events, or projects
Funders and commissioners	Participation statistics, monitoring information (usually anonymised), contact details for key staff	To meet funding and reporting requirements
Regulators and statutory bodies (Charity Commission NI, HMRC, etc.)	Organisational and trustee details, Gift Aid records, employment data	To comply with legal and regulatory duties
Safeguarding partners (PSNI, Gateway teams, health & social care)	Names, contact details, safeguarding records, medical details if required	To protect children, young people, or vulnerable adults where there are concerns

Professional advisers (auditors, insurers, legal advisers, accountants)	Relevant contact or case details, organisational records	To obtain professional services and comply with legal duties
Suppliers and service providers (e.g. IT, survey tools, email/mailing platforms, event booking systems)	Names, emails, participation details	To provide systems and services that support our work
Staff, volunteers, trustees and advisors (internal)	Contact details, participation or membership records, safeguarding info if relevant	To enable them to carry out their NIYF role responsibly

(11) OTHER TYPES OF DATA WE HOLD

11.1 Special Category Data

11.1.1 Some of the personal data NI Youth Forum collects and stores may include special category data.

11.1.2 Special category data means information that is more sensitive and therefore needs extra protection. This may include: race or ethnicity, religious or philosophical beliefs, political opinion, trade union membership, sex life or sexual orientation, gender identity, health information (including medical conditions, disabilities, pregnancy status, genetic or biometric data), marital status, country of birth / national identity and caring responsibilities .

11.1.3 We only collect this information where it is necessary, and we always apply additional safeguards. Special category data will only be stored and/or shared for specific legal purposes, such as safeguarding, employment law, or when required by a funder.

11.1.4 We only process this type of data where one of the conditions in Article 9 UK GDPR applies, for example: explicit consent, safeguarding obligations, employment and social security law, or substantial public interest.

11.2 Aggregated Data

11.2.1 NI Youth Forum may also collect, use, and share aggregated data.

11.2.2 Aggregated data is statistical or demographic information that does not identify an individual (for example, youth participation rates across projects).

11.2.3 While aggregated data may be derived from personal data, it is not considered personal data in law if it does not reveal someone's identity.

11.3 Use of Cookies on our Website

11.3.1 NI Youth Forum website uses cookies to enhance user experience and to understand how our website is used. Cookies are small text files placed on your device when you visit a website.

11.3.2 We only use cookies that are:

11.3.3 Essential cookies – required for the website to function and cannot be turned off.

11.3.4 Consent-based cookies – used to improve your browsing experience or manage cookie preferences.

11.3.5 We do not require users to log into our website, and we do not serve advertising. Cookies do not store personal data.

11.3.6 You can choose to accept or reject non-essential cookies through our cookie consent banner.

11.3.7 Details of the cookies we use are set out in the table below.

Table 5: The cookies we use

Cookie Name	Purpose	Retention Period
cookielawinfo-checkbox-analytics	Records consent for “Analytics” cookies	11 months
cookielawinfo-checkbox-functional	Records consent for “Functional” cookies	11 months
cookielawinfo-checkbox-necessary	Records consent for “Necessary” cookies	11 months
cookielawinfo-checkbox-others	Records consent for “Other” cookies	11 months
cookielawinfo-checkbox-performance	Records consent for “Performance” cookies	11 months
viewed_cookie_policy	Stores whether the user has consented to cookies	11 months

(12) WHERE NI YOUTH FORUM STORES THE DATA IT COLLECTS

12.1 NI Youth Forum stores personal data using secure systems. Most of our data is held on servers located within the United Kingdom or the European Economic Area (EEA).

12.2 Some of our service providers (for example, Google, Microsoft, SurveyMonkey, Mailchimp etc.) may process or store data outside the UK/EEA. Where this happens, our providers include appropriate safeguards in their contracts and service agreements, such as UK-approved Standard Contractual Clauses (SCCs), to ensure data remains protected.

12.3 Staff and volunteers may also access NI Youth Forum data through secure mobile devices or personal devices that are protected by passwords, encryption, and security policies.

12.4 The table below shows the main ways we store personal data:

Table 6: Where NI Youth Forum stores the data it collects

Storage Method	Examples
Cloud-based systems	Microsoft 365, SharePoint, OneDrive, Google Drive
Email inboxes	Outlook, Mail
Databases / CRMs / MIS	Excel spreadsheets, contact management systems
Secure paper records	Consent forms, sign-in sheets, membership forms, medical forms, programme evaluations, My Journey Booklets, project enrolement forms, progression forms.
Survey tools	Microsoft Forms, Google Forms, SurveyMonkey
Mobile devices	NI Youth Forum work phones or tablets; staff BYOD (with password/encryption policies)

(13) HOW LONG DOES NI YOUTH FORUM RETAIN THE DATA IT COLLECTS

13.1 NI Youth Forum only keeps personal data for as long as necessary to carry out our work, meet legal or regulatory requirements, or satisfy funders' conditions. When data is no longer needed, it is securely deleted or destroyed.

13.2 The record retention prcoedures are outlined below and may be updated where there are legal, safeguarding, or funder requirements.

13.3 In the event of an audit, investigation, or legal action, record disposal may be suspended on the instruction of the Executive Committee.

13.4 The table below outlines the main types of records we keep and how long they are normally retained.

Table 7: Record Retention Procedures

Document / Data Type	Retention Period
Financial documents	7 years
Project monitoring data	7 years
Project reports	7 years
Executive Committee minutes	Permanently (archived)

AGM minutes	Permanently (archived)
Staff meeting minutes	2 years
Recruitment information (unsuccessful applicants)	1 year
Personnel records (employees)	6 years after employment ends
AccessNI information	6 months after recruitment decision, in line with AccessNI Code of Practice
Risk assessments	3 years after last review, or longer if the activity remains relevant
Funding body reports	7 years (or longer if required by the funder)
Insurance information	41 years
Accident report records (adults)	3 years after last entry
Accident report records (children/young people)	Until the individual reaches 21 years old (3 years after their 18th birthday, whichever is later), in line with Health & Safety Executive (HSE) requirements.
Fair employment monitoring returns	3 years after employment ends
CCTV monitoring	28 days (unless required longer for investigation)
Special category data (e.g. health, safeguarding, equality monitoring)	Only as long as necessary for the specific purpose (e.g. project delivery, legal obligation, safeguarding) then securely deleted

(14) ACCESSNI: DISCLOSURE APPLICATIONS AND DISCLOSURE INFORMATION

14.1 As an organisation using AccessNI to help assess the suitability of applicants for positions of trust, NI Youth Forum complies fully with AccessNI's Service Level Agreement and the Data Protection Act 2018 regarding the handling, use, storage, retention and disposal of Disclosure Applications and Disclosure Information.

14.2 Consent: As NI Youth Forum no longer receives a copy certificate directly from AccessNI, we will always obtain the applicant's written consent before requesting and retaining a copy of a Disclosure certificate.

14.3 Storage and Access: Disclosure information will be kept securely in lockable, non-portable storage containers with strictly controlled access, limited only to those entitled to see it as part of their duties.

14.4 Handling and Usage: In accordance with section 124 of the Police Act 1997, Disclosure information will only be passed to authorised individuals in the course of their duties. A record will be maintained of all persons to whom Disclosure information has been revealed. We recognise that it is a criminal offence to pass this information to anyone not entitled to receive it. Disclosure information will be used solely for the purpose for which it was requested and with the applicant's consent.

14.5 Retention: Disclosure information will not be kept for longer than is necessary. Once a recruitment or other relevant decision has been taken, NI Youth Forum will comply with AccessNI's requirements by returning the original Disclosure certificate to the applicant and retaining records only for the agreed period.

14.6 Disposal: Once the retention period has elapsed, Disclosure information will be destroyed securely, for example by shredding, pulping or burning. Pending destruction, Disclosure information will not be kept in any unsecured receptacle. NI Youth Forum will not retain photocopies or images of the Disclosure or any representation of its content. However, we may keep a simple record of the date of issue, the name of the subject, the type of Disclosure requested, the position applied for, the AccessNI reference number, and the outcome of the recruitment decision.

(15) USE OF CCTV

15.1 NI Youth Forum uses Closed Circuit Television (CCTV) at its premises for the purposes of security, the safety of staff, volunteers, members, and visitors, and for the prevention and detection of crime.

15.2 CCTV recordings may capture images of staff, volunteers, members, visitors, and members of the public. These images are classed as personal data under data protection law.

15.3 Access to CCTV footage is strictly limited to authorised staff and service providers (as outlined in the CCTV policy), and will only be shared with third parties (such as the PSNI) where required by law or for the investigation of incidents.

15.4 CCTV recordings are normally retained for 28 days, after which they are automatically overwritten, unless they need to be kept longer for the investigation of an incident.

15.5 Clear signage is displayed in all areas where CCTV is in operation. Individuals have the right to request access to CCTV images of themselves, subject to exemptions. Requests should be made in writing to NI Youth Forum.

(16) THE RIGHTS OF THE DATA SUBJECT

16.1 Data subjects have the following rights in respect of their personal data, which can be enforced against NI Youth Forum as the controller:

16.2 **Right to be informed** – to know what personal data we collect, why we collect it, how it is used, and who it may be shared with.

16.3 **Right of access** – to request a copy of the personal data we hold about you, together with information about:

16.3.1 why we are processing it
16.3.2 what categories of data are involved
16.3.3 who it has been or will be shared with
16.3.4 how long we will keep it
16.3.5 where the data came from if not provided directly by you.

16.4 **Right of rectification** – to have inaccurate or incomplete personal data corrected.

16.5 **Right to erasure (right to be forgotten)** – in certain circumstances, to have your personal data deleted.

16.6 **Right to restrict processing** – to ask us to stop using your data temporarily, for example while accuracy is being checked.

16.7 **Right to data portability** – to request that we transfer your data to another organisation in a structured, commonly used, machine-readable format.

16.8 **Right to object to direct marketing** – to stop us from using your data for marketing.

16.9 **Right to object to automated decision-making** – not to be subject to a decision based solely on automated processing that has significant effects.

16.10 To exercise any of these rights, please contact NI Youth Forums Data Protection Officer at info@niyf.org / 02890331990 / 68 Berry Street, Belfast, BT1 1FJ. We may need to verify your identity before processing your request.

16.11 We aim to respond to all valid requests within one month. If the request is complex or numerous, we may extend this by a further two months, but we will tell you if this is the case.

16.12 If you are unhappy with how NI Youth Forum handles your data, you also have the right to complain to the Information Commissioner's Office (ICO)**,** which is the UK's supervisory authority for data protection.

(17) WHAT HAPPENS IF A DATA SUBJECT NO LONGER WANTS NI YOUTH FORUM TO PROCESS PERSONAL DATA ABOUT THEM

17.1 Individuals have the right to withdraw consent or object to NI Youth Forum processing their personal data.

17.2 If we are processing personal data on the basis of consent (for example, marketing communications, use of images, or equality monitoring), individuals may withdraw their consent at any time by contacting our Data Protection Officer.

17.3 We will stop processing that data as soon as possible. This may affect their ability to access NI Youth Forum's services due to safeguarding responsibilities.

17.4 If we are processing personal data on the basis of legitimate interests or for our legal obligations (for example, safeguarding records, employment records, or financial reporting), we may be required to continue holding some data even if an objection is raised. In such cases we will explain clearly why we cannot erase or stop processing the data.

17.5 We will normally respond to any valid request within one month. If the request is complex, this may take up to three months, but we will let the individual know if this applies.

(18) WHAT SECURITY PROCEDURES NI YOUTH FORUM HAS IN PLACE

18.1 NI Youth Forum is committed to keeping personal data safe. We take appropriate technical and organisational measures to protect against loss, misuse, unauthorised access, disclosure, alteration, and destruction of personal data.

18.2 The level of protection applied depends on the sensitivity of the information and the risks that could arise if it were mishandled.

18.3 The table below sets out the main security procedures we have in place for different types of data and activities. These procedures are reviewed regularly and updated where necessary.

Table 8: Security Procedures

Area	Procedures in place
Paper records	- Stored in locked cabinets/safes with restricted access - Not left unattended or in public view - Securely transported if removed from premises (never left in vehicles, locked away at destination) - Shredded when no longer required
Electronic records	- Encrypted and password-protected Cloud accounts with unique logins and regularly updated passwords - Remote wipe enabled where possible - No use of unencrypted memory sticks - Emails with sensitive data password protected or sent via secure platforms
Staff responsibilities	- Care when printing/photocopying (no copies left behind) - Double-check recipients when emailing (avoid autofill errors) - Complete regular data protection/security training - Report any suspected data breaches immediately
Portable/removable devices	- Only used if encrypted and password-protected - Kept securely when not in use

Physical and organisational security	- Regular office security reviews- - Extra measures implemented if risks increase
Retention & disposal	- Data kept only as long as necessary per Retention Policy - Paper documents shredded - Electronic files securely deleted
BYOD (personal devices)	- Personal devices must be password-protected and comply with NI Youth Forum's policies - Encryption used where possible
Incident management	- Data breaches reported immediately to management/DPO - Investigated and managed in line with Data Breach Procedure

(19) DATA BREACH PROCEDURE

19.1 A personal data breach is any incident that leads to the accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to, personal data.

19.2 Examples include: lost or stolen devices, emails sent to the wrong person, unauthorised access to files, or accidental deletion of records.

19.3 NI Youth Forum takes all personal data breaches seriously. All staff, volunteers, and trustees must report any suspected or actual breach immediately to the Data Protection Officer (DPO).

19.4 On being notified of a breach, the DPO will:

19.4.1 Inform the CEO *(if DPO is not the CEO)*;
19.4.2 log the breach and start an internal investigation;
19.4.3 assess the severity, including what data is involved, how many people are affected, and the potential risks;
19.4.4 take immediate steps to contain the breach (for example, disabling access, recovering records, contacting IT support).

19.5 Where a breach is likely to result in a risk to the rights and freedoms of individuals, NI Youth Forum will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it. If we do not do so, we will record reasons for the delay.

19.6 Where a breach is likely to result in a high risk to individuals (for example, if sensitive or special category data has been exposed), we will also notify the affected individuals without undue delay, explaining:

19.6.1 what has happened;
19.6.2 what data is involved;
19.6.3 what steps have been taken to reduce risks; and
19.6.4 what actions they can take to protect themselves.

19.7 All breaches will be documented in NI Youth Forum's Data Breach Log, including the facts, effects, and remedial actions taken.

19.8 Following a breach, NI Youth Forum will review its systems, training, and policies to reduce the risk of recurrence.

19.9 The DPO or CEO will also update the Executive Committee as appropriate.

(20) COMPLAINTS PROCEDURE

20.1 If you have any questions or concerns about how NI Youth Forum uses your personal data, please contact our Data Protection Officer (DPO) at info@niyf.org / 02890331990 / 68 Berry Street, Belfast, BT1 1FJ.

20.2 If you are not satisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection. You can do this online at www.ico.org.uk/concerns or by calling 0303 123 1113.

(21) NOTIFICATION OF CHANGES TO THIS POLICY

21.1 NI Youth Forum may update this Data Protection and Privacy Policy from time to time to reflect changes in the law, our practices, or how we process personal data.

21.2 When significant changes are made, we will:

21.2.1 update the version and date at the top of this policy;
21.2.2 publish the revised policy on our website at www.niyf.org; and
21.2.3 where appropriate, notify members, staff, volunteers, or supporters directly (for example by email or newsletter).

21.3 We encourage all staff, members, and supporters to review this policy regularly to stay informed about how we protect personal data.

(22) BREACHES OF THIS POLICY AND DISCIPLINARY PROCEDURES

22.1 All staff, volunteers, and trustees are required to comply with this Data Protection and Privacy Policy.

22.2 Any breach of this policy, whether deliberate or negligent, will be treated seriously. Breaches may put NI Youth Forum at risk of reputational damage, legal action, or regulatory penalties.

22.3 Minor breaches may be addressed through training, supervision, or informal management action.

22.4 Serious or repeated breaches may result in formal disciplinary action, up to and including dismissal, in line with NI Youth Forum's Disciplinary Rules and Procedures set out in the Staff Handbook.

22.5 Where a breach is suspected to involve unlawful activity (for example, unauthorised disclosure of personal data), this may also be reported to external authorities such as the Information Commissioner's Office (ICO) or the Police.