



Kilkenny County Council
Comhairle Chontae Chill Chainnigh



Kilkenny County Council Healthy Ireland Fund Privacy Statement: June 2023-December 2025

The Healthy Ireland Fund is managed and administered by Pobal on behalf of the Department of Health. Kilkenny Local Community Development Committee provides oversight and management of the delivery of the Healthy Ireland Fund on behalf of Kilkenny County Council. The Purpose of the Healthy Ireland Fund is to promote and support the Health and Wellbeing of Kilkenny. The Kilkenny LCDC works to improve health and wellbeing by creating and improving the physical and social environment and developing community resources that help people support each other. This is achieved through collaboration with local agencies and working together to maximize resources with the overall aim to improve health and wellbeing and reduce health inequalities for our citizens of Kilkenny

With Respect to the Healthy Ireland Fund the Department of Health is the Data Controller for the collection and processing of personal data for the Healthy Ireland Fund grant agreements and related reporting requirements. Pobal is a data processor for the purposes of managing the HIF grant agreements and related reporting requirements. Kilkenny County Council is a may act as a Data Controller or Data Processor for the purpose of managing the Healthy Ireland programme locally. Each implementing partner on the Healthy Kilkenny programme is a data processor for the collection and processing of personal data for the purpose of reporting on the Healthy Ireland Outcomes and reporting requirements.

Where we act as Data Controller:

Kilkenny County Council will act as Data Controller where we lead on the project /activity and determine the means and purpose of that project /activity.

Where we act as Data Processor:

Kilkenny County Council will act as Data Processor where the Implementing partner lead on the project /activity and determine the means and purpose of the project /activity.

For the purposes of the project activities and contract conditions as set out in the Healthy Kilkenny Partnership agreement **Kilkenny County Council** are the data **Controllers** and Kilkenny County Council and Roisin Hickey, On Your Rothar (sub-contractor)are the data **Processors**

This Privacy Notice provides information about:

- 1) The purpose and types of data collected by Kilkenny County Council to assist in the administration of the Healthy Ireland Fund.
- 2) How your data is collected, stored and retained by Kilkenny County Council
- 3) What your data protection rights are when you participate in the Healthy Kilkenny Program.

Personal Data includes “any information relating to an identified or identifiable natural person” as defined under [Article 4 of the GDPR](#). The categories and types of data being processed are listed below under ‘types of personal data’. Where it is necessary to collect special category data within the meaning of [Article 9 of the GDPR](#) we must obtain explicit consent from relevant individuals.

Legal Basis for collecting, retaining and processing personal and non-personal data

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Kilkenny County Council in accordance with Article 6(1) (e) and Article 9(2) (g) of the General Data Protection Regulation, 2016. Specifically, the lawful basis for this process is contained in:

- Section 66(e); 67.1 and 67.2 of the 2001 Local Government Act
- Section 36 of the 2014 Local Government Reform Act: Local Community Development Committees

Purpose of collecting and retaining personal and non- personal data:

Kilkenny County Council will keep personal information only for lawful purposes in line with data protection legislation. Kilkenny County Council will use all personal data for the purposes for which it has been collated. This includes:

- Processing your application and financial information and progress reporting to [Pobal](#) (Data Processors on behalf of the Department of Health)
- Audit purposes (all information and files for the Healthy Ireland Fund are retained in Kilkenny County Council)
- To capture information on physical activity levels and cycling in our communities in Kilkenny

Types of Personal Data

The types of personal data processed may vary depending on the type of projects funded under the Healthy Ireland Fund. **Microsoft forms** is the platform that will be used for the survey and consent for the cycle to school initiative. We will do our utmost to ensure your anonymity. We will not gather your IP address. Further details on Microsoft Form’s data protection policies and procedures can be found [HERE](#)

Personal data in the **Survey** for cycling programmes will relate to:

- Project outcomes on physical Activity. This will include participants' anonymised datasets including:
- Parental consent – for anyone under the age of 16
- Participant known disability/medical condition/ injury (if applicable). We need this information for safety reasons
- Name – names will be removed and replaced with an ID number
- Participant Age
- Participant townland
- Participant level of engagement
- Participant Physical Activity Levels
- Participant cycling confidence levels
- Mode of transport

Personal data in the **Cycle to School Initiative** will relate to the following information captured during the registration process:

- Parent/Guardian Name
- Emergency Contact Number
- Parental consent
- Participant Information – Name, age, gender, known disability/medical condition (if applicable), physical activity levels, cycling confidence
- Mode of transport to school

Who are we sharing your personal data with?

Your data will be stored in Kilkenny County Council and will be shared with Pobal (Data Processor), who manage the Healthy Ireland Fund on behalf of the Department of Health (Data Controller). No personal information that identifies you will be shared.

Where will the information be stored?

The data we collect will be stored on online password protected storage systems within Kilkenny County Council. Once the survey has been completed your responses will be linked with a participant number. Your identifying information will be deleted and will not be included with your survey responses. Once all identifying information has been removed, we will carry out our own analysis of the data on the Healthy Ireland outcomes

Retention Period/Duration

Kilkenny County Council will retain all data under this agreement for a total of seven years commencing from the end of the programme. Therefore, data will be retained until 2032. Data will then be deleted and destroyed in line with the [National Retention Policy](#).

Your Rights:

You have rights in respect of your data that we are processing as part of the Healthy Ireland Fund, These rights include the following:

- The right to access a copy of your personal data
- The right to rectification
- The right to erasure
- The right to restriction of processing
- The right to data portability
- The right to object processing
- The right to withdraw consent
- The right to lodge a complaint with the Irish Data Protection Commission

For full details of the collection, processing and sharing of your personal data by us and your rights in this regard, please see our full Privacy Notice on the website [here](#)

Where we are processing data based on your consent, you have the right to **withdraw consent** at any time. You can withdraw your consent by email to Janette Boran, Healthy County Coordinator, Community Section, Kilkenny County Council community@kilkennycoco.ie . All necessary steps will be undertaken to delete your information within **4 weeks** of the request to withdraw your personal information.

Data protection Policy

Kilkenny County Council has a detailed [Data Protection Policy](#) which goes into more detail on how we as a public body are committed to ensuring the security of any personal data you provide to us.

Data subject access requests

If you would like to contact the Data Protection Commission in respect of our processing of your personal data under the Healthy Ireland Fund or your privacy rights, you can do so at any time by clicking [here](#). or visit: <https://forms.dataprotection.ie/contact>

Kilkenny County Council Privacy Policy can be accessed at the following link: [Data Protection Policy and Code of Practice](#)

Healthy Ireland Fund Implementing Partner Operations

The Healthy Ireland Fund Implementing Partner and their employees shall treat all Personal Data as strictly confidential information; it shall not be copied, transferred or otherwise processed in conflict with the instruction, unless it is agreed in writing with Kilkenny County Council.

The Data Processors shall implement the appropriate technical and organisational measures as set in the Applicable Law, including in accordance with GDPR, article 32. The security measures are subject to technical progress and development. The implementing partner may update or modify the security measures from time to time provided that such updates and modifications do not result in the degradation of the overall security.

The Data Processors and Controllers shall have appropriate legal processes in place to collect, process and store participants information for example:

- Information will be sought by Consent to collect participants data and parental consent when working with minors. Participants can withdraw anytime and data will be deleted in accordance with the implementing partner's *GDPR Policy data right to withdraw procedures*
- Each Participant must have access to your privacy statement explaining what will happen with their information, where it is going and what it will be used for
- A separate consent must be sought if you are contacting participants beyond the programme/activity

Review:

This policy will be reviewed regularly in light of any legislative or other relevant indicators.