

FAIR PROCESSING NOTICE – GARDA VETTING SUBJECTS

- 1. The Irish Red Cross ('we', 'us', 'our') is the data controller of information provided to us by you, a person consenting to be vetted by the <u>National Vetting Bureau (NVB) of An Garda Síochána</u> through the Irish Red Cross (IRC). The IRC can be contacted through our website at <u>www.redcross.ie</u>, and the data protection officer can be contacted at <u>dpo@redcross.ie</u>.
- 2. This notice sets out how we process your personal data in our efforts to facilitate your Garda vetting as required under National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016.
- 3. If you work with or undertake relevant work or activities under a relevant organisation, such as the IRC, of which a necessary and regular part of it consists of having access to or contact with children or vulnerable adults, you must go through Garda vetting.

To facilitate this process, you will be providing the Irish Red Cross with personal data for the purposes of ID verification (i.e. Confirmation of your proof of identity and address) and submission of your Garda Vetting Application to the NVB. Consequently, the NVB will issue the IRC's authorised liaison person (LP) a vetting disclosure for review.

Should a disclosure contain criminal record information or specified information, this disclosure will be shared with you and reviewed by the IRC's vetting and safeguarding team for a determination on your permitted involvement with the proposed IRC role or activity in line with our policies.

For details on the information a vetting disclosure contains, please see the Citizen's Information section: <u>Information on your vetting disclosure.</u>

Additional information on data processing and your data rights concerning Garda Vetting can be found in the following guidance note from the Data Protection Commission: Garda Vetting April 2021..pdf.

4. Personal data you provide may include your name, address, contact details, household composition by age (if hosting minors under IRC programming), and copies of your identification documents (photo ID & proof of address). In compliance with NVB audit requirements, the authorised vetting verifier must verify and make copies of the original

identity and address documents you provide. NVB accepted documents are referenced in the tables below (these lists may change from time to time).

Photo ID

In date passport from country of citizenship

Irish/EU/UK driving licence or learner permit (credit card format)

Irish certificate of naturalisation

National Identity Card (for EU/EEA/Swiss citizens)

Proof of Address (issued within last 6 months)

Bank Statement from a recognised bank (not private money lenders or Revolut) Building Society Statement,

Credit Union Statement,

Credit Union Passbook.

Utility bill (the only utility bills accepted are: gas, electricity, television,

broadband, waste & TV licence) – issued within the last 6 months)

Correspondence from Government departments

Letter from Local Council confirming residency

Valid Irish/EU/UK driving licence or learner permit (credit card format) if not used as photo ID issued within the last 6 months

We recognise some 16- and 17-year-old vetting subjects may not have the required photo ID or proof of address documents mentioned above. In this case the follow documents are acceptable

For photo ID, a birth certificate can be used

For proof of address, a written statement by a school principal or an accredited third level institution confirming the vetting subject's attendance, address and issued within the last six months will be accepted.

- 5. Updated guidance from the NVB requires IRC trained verifiers to make copies of a vetting subject's original ID and proof of address documents by photocopier or digital capture. Where facilities such as public libraries or copying centres are used, modern photocopiers may temporarily retain digital images on internal storage devices before being overwritten. Whilst the likelihood of any data breach through such facilities is low given their professional operation and existing data protection frameworks, vetting subjects should be aware of this risk. Vetting subjects may decline the use of public photocopiers and instead arrange verification at an IRC branch, Head Office, or through alternative arrangements.
- 6. There are two ways the Authorised Vetting Verifier can submit your vetting form(s) and supporting documentation to the Irish Red Cross Vetting Team.

By post or physical delivery: The authorised verifier will post or physically deliver the hard copies made in your presence following verification.

- Any physical documents submitted will be in a sealed envelope addressed, Attn: IRC Garda Vetting Team, 16 Merrion Square, Dublin 2, D02 XF85.
- These documents will be stored to secure folders whose access is restricted to authorised IRC personnel.

By digital upload: via an IRC-issued webform/application in your presence

 All personal data and documentation uploaded via the webform/application will directly populate to secure IRC-licensed Microsoft SharePoint folders whose access is restricted to authorised IRC personnel.

Please note, however, the IRC is <u>required</u> by the GNVB to hold original copies of completed NVB form(s). Therefore, if digital upload is used, the original NVB form(s) will also be submitted to IRC Head Office in line with point A above.

- 7. We process this data and any personal data you provide us with, or which returns in your disclosure to ensure that there is a valid vetting disclosure in place for you. This may include, but is not limited to, the following processing activities:
 - a. Coordinating ID verification as the relevant organisation for submission of your vetting application to the NVB
 - Contacting you in relation to the vetting process as it relates your volunteering/pledging activity
 - c. Liaising with National Vetting Bureau or other third parties as required
 - d. Consulting with you to assess eligibility for a particular proposed IRC role or activity
- 8. The lawful basis we rely on for processing personal data in the context of Garda vetting is the legal obligation (GDPR Article 6(1)(c)) of the IRC to comply with <u>national vetting legislation</u>.
- 9. Where identity documents contain special category personal data (such as information revealing nationality, ethnicity, or age), we process this data under Article 9(2)(b) GDPR for the purpose of carrying out obligations in the field of employment and social protection law, specifically our legal requirements to conduct appropriate vetting of individuals working with children and vulnerable persons.
- 10. All IRC validators receive mandatory data protection training and follow confidentiality agreements.

- 11. Please note that data in relation to Garda vetting will be retained by the IRC for no longer than necessary. In order to demonstrate compliance with the national vetting legislation and in case of future queries in relation to a vetting disclosure, the reference number and date of disclosure is retained on file which can be checked with the NVB.
- 12. For any queries in relation to your data and the Irish Red Cross, please contact dpo@redcross.ie.

The Irish supervisory authority for data protection is the Data Protection Commissioner. If you are dissatisfied with how we process your personal data, you have the right to complain to the DPC as the Irish supervisory authority. General guidance as to how the Commission handles complaints can be accessed <u>here</u>.

Last Updated: 11 November 2025