



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine



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Inagh EIP - Final Report



Inagh EIP (LLOC5 034)

Farmer led biodiversity enhancement project in a farming and forestry area, addressing habitat fragmentation, while improving water quality, bog and riparian biodiversity in the Upper Inagh River Catchment, West Clare

Submitted by the Inagh EIP

for and on behalf of the Inagh EIP Operational Group

19th August 2023

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Section 2: Key Terms, Abbreviations & List of Annexes

Inagh EIP:	The adopted project name of the Department of Agriculture, Food and Marine funded European Innovation Partnership funded under Open Call No 5 (A farmer-led biodiversity enhancement project in the Upper Inagh River Catchment, West Clare).
Project Actions:	The listed actions (work tasks) as set out in the application in response to Open Cal No. 5 of the Department of Agriculture, Food and Marine for EIP funding support.
Lead Partner:	River Catchment Ecosystem Services Limited (the lead partner implementing the Inagh EIP)
Operational Group:	The establishment of an Operational Group (OG) is key to the entire EIP process and is a requirement for EIP funding support from the DAFM. The Inagh EIP OG was established with the intention of bringing together multiple actors (farmers, forestry owners, agri-environmental advisers, forestry experts, researchers, businesses, environmental groups, consumer interest groups or other NGOs) to ensure the full and timely implementation of the project and to advance innovation within this project across both the agricultural and forestry sectors. In addition to the lead partners, the OG included: River Catchment Ecosystem Services Limited, Heritage Officer, Clare County Council; Agricultural Sustainability Support and Advisory Service, Kerry Agribusiness; Environmental Fisheries Officer, Inland Fisheries Ireland; Fisheries Officer, Inland Fisheries Ireland; Inagh River Catchment Management Association; Irish Forestry Unit Trust; Association of Irish Forest Consultants; Local farmers - champion for farmer liaison; Local farmer and forestry owner - champion for farmer and forestry land owner liaison; Local farmer and key champion for farmer liaison and IFA rep; John Geraghty, SETU formerly Waterford IT and soil specialists.
Project Supporters:	Term used to describe third party supporters that had no direct day-to-day involvement in the implementation of the Inagh EIP, but who were involved in various aspects of the project. They included the EPA, LAWPRO, Teagasc, the IFA, the Forestry Service of the DAFM, the Association of Irish Forest Consultants, Coillte, local angling bodies and local community groups, Inagh River Catchment Management Association, Connolly Tidy Towns.

Abbreviations

ASSAP	Agricultural Sustainability Support Advisory Programme
CCC	Clare County Council
DAFM	Department of Agriculture, Food, and the Marine
IFA	Irish Farmers Association
IFI	Inland Fisheries Ireland (Component Authority)
LAWPRO	Local Authority Waters Programme
NPWS	National Parks and Wildlife Service (Component Authority)
EPA	Environmental Protection Agency
Teagasc	Irish Food & Agricultural Advisory Authority
SETU	South East Technological University

Section 3:

3.1 Final Report – Executive Summary:

The Inagh European Innovative Partnership (abbreviated to Inagh EIP) was a two-year farmer-led biodiversity enhancement project focused on the Upper Inagh River Catchment, West Clare. The project proposal was for “Farmer led biodiversity enhancement in a forestry area, addressing habitat fragmentation, while improving water quality, bog and riparian biodiversity in the Upper Inagh River Catchment, West Clare.”

The Inagh EIP was approved for funding in the early summer of 2021 as part of Open Call No 5 - Farm & Community Biodiversity Initiative by the Department of Agriculture, Food, and the Marine (DAFM). The application was developed locally by the local farming community and the wider community. The project became operational in the Summer of 2021 under COVID-19 restrictions. It had its official launch on the 26th November in Connolly, West Clare and became fully operational at this stage operating at various stage under COVID-19 restrictions. Having received a project prolongation from the Locally Led Unit of the DAFM, the Inagh EIP completed its operations on the 31st March 2023, having operated in a farm, forestry and raised bog area to address local habitat fragmentation to enhance farm, bog and riparian biodiversity and improve water quality.

The main operational and delivery phase was from November 2021 to March 2023. The project’s focus area was a remote area of West Clare where agriculture and forestry collectively were a significant pressure on local water quality with associated knock-on impacts on local biodiversity. The focus area of the Inagh EIP has for much of the past 25 years witnessed a major transformation in land management practices, land use and farming, not unlike other parts of West and East Clare. Forestry, as a land use, has dramatically increased over the past 25 years and this formed a major focus of the Inagh EIP. Project participants worked to address habitat and biodiversity loss and implemented a large suite of mitigation measures to help address the pressures on local habitats (local water bodies, bogs, and fragmented areas of native woodland).

In its two-year timeframe, the Inagh EIP worked to deliver a new approach to address the joint local concern of biodiversity and habitat loss, coupled with the concurrent loss of high ecological status water bodies. It did so by working in very close cooperation with participating farmers and forestry owners and by developing farming for nature and catchment-sensitive farming and forestry practices. The Inagh EIP successfully delivered on its overall aim to demonstrate that biodiversity loss can be minimised. It successfully highlighted that site-specific mitigation measures, the right measures in the right place, can be implemented by farmers, with the appropriate support of farm and forestry advisors and catchment scientists. By working together at a sub-catchment level, the Inagh EIP successfully delivered for local landowner and the local community in a remote rural landscape, highly modified by Sitka spruce plantation. By focusing its implementation programme on the needs of local landowners and by continually building and supporting the locally led collaborative partnership, the Inagh EIP had farmers centrally involved in the co-design and implementation of an innovative suite of measures, which the farmers themselves took ownership of. The wide range of measures that the participating farmers implemented in the period from November 2021 to March 2023 have greatly helped to address the biodiversity loss, habitat fragmentation and the decline in water quality which were identified at the planning stage of the Inagh EIP.

The Inagh EIP project, was led by River Catchment Management Ecosystem Services Limited, a company limited by guarantee, which was established specifically for the purposes of the implementation of the EIP after the Inagh River Catchment Management Association, which it was initially intended would act as the lead implementation party for the Inagh EIP withdrew from this role. The Inagh EIP Operational Group (OG) included numerous stakeholders including the following: Clare County Council, Inland Fisheries Ireland, South East Technological University, Teagasc, Agricultural Sustainability Support and Advisory Programme, Kerry Agri-Business, Local Authority Waters Programme, the Irish Forestry Unit Trust (IForUT), local farmers; local forestry owners and local community groups. The members of the Inagh EIP Operational Group were extremely active and supportive in the implementation phase of the project. Various OG members had extensive expertise in managing and delivering collaborative projects of this nature and this greatly assisted in their successful delivery of this water, habitat, and biodiversity enhancement project.

The overall aim of the Inagh EIP was to support local farmers, forestry owners and members of the local community to address the challenge of biodiversity loss by enhancing habitat connectivity, addressing water quality concern, and habitat loss in the Upper Inagh River catchment, West Clare. The project ran from late 2021 to the 31st March 2023. The operational area, located in the parishes of Kilmaley and Inagh, focused on the townlands of Ballynoe, Cloontabonniv, Feighroe and Drumatehy in Kilmaley, and Formoyle Oughteragh West within the Upper Inagh River Catchment. The dominant agricultural activity in the area is suckler and beef farming, together with forestry. The overall project budget secured from the DAFM was €181,450. The entirety of the budget was fully utilised during the implementation phase of the project with approximately €121,000 going toward farm payments directly related to the implementation of a suite of on farm measures. These measures had been co-designed and co-developed with local farmers, forestry owners, the local community, project partners and the EIP Operational Group. The remaining budget was used on project management, administration, monitoring and evaluation, external assistance, together with community outreach, demo days and an excellent end of project conference / seminar.

The Inagh EIP fully delivered on all of its stated objective and the participating farmers fully delivered on the practical water quality and biodiversity actions which they themselves had helped co-design. These measures have enhanced local biodiversity and improved riparian biodiversity and water quality.

3.2 Keyword Category: *Catchment sensitive farming, water quality, biodiversity net gain, forestry best practice, riparian habitats, farming for nature, inter agency cooperation, and community collaboration.*

3.3 What the Inagh EIP Project Delivered:

- During the project implementation phase, full delivery took place of a suite of co-designed, practical, measures which included biodiversity actions and measures to improve water quality.
- The measures implemented by local farmers have helped address biodiversity loss, water quality concerns and habitat fragmentation.
- This suite of measures was delivered across 12 farms and included biodiversity support measures and measures to improve water quality (native tree planting, creation of riparian buffer zones, biodiversity ponds, interconnected pond networks, creation of wildlife corridors, detunnel works along stream and rivers, gravel raking in river, bank protection works, farm yards works, farm road works, fencing of river courses, installation of alternative cattle drinking sources, restricting cattle access points to rivers / streams, etc.) implemented by local landowners with the support of Inagh EIP.
- Habitats and biodiversity corridors expanded and reconnected on 7 different farms
- Significant increase in awareness levels, at a local and regional level of biodiversity, the role of trees on farms / on the land, of the importance of good water quality for multiple farmer and forestry owner demo days and events and local community outreach and awareness events.
- Participation by farmers / forestry owners and the local community in practical biodiversity training.
- The collaborative partnership developed and seen through the co-design of the suite of mitigation measures, working to address biodiversity loss.
- Detailed assessment of local biodiversity on farmland and in forestry areas, which it is now hoped will be used for ongoing monitoring and the future planning of larger-scale EIP / future agri-environmental scheme for the Upper Inagh River Catchment and the wider Inagh Catchment.

3.4 Project Implementation Period: 01/07/2021–31/03/2023

Section 4: Final Report – Inagh EIP 2021 to 2023 - The Approach Delivered By The Inagh EIP

- 4.1 Context:** At application stage in 2020/2021, agriculture and forestry were identified as significant pressures impacting on biodiversity and water quality in Irish water bodies. The Upper Inagh River, Connolly, West Clare, Ireland, which was the focus area of this EIP, has over the past 25 years witnessed a major transformation in land management practices, land use and farming. The amount of land planted for forestry has increased by over 145% (1980 to 2020). It was noted at application stage, that this change in land use has resulted in significant habitat and biodiversity loss and has placed serious pressure on local habitats (bogs, natural water bodies, and fragmented native woodlands).
- 4.2 The New Approach Delivered:** The Inagh EIP was designed to deliver a new approach to begin to address habitat loss and the loss of high ecological status water bodies. It worked to do so by developing a catchment-sensitive farming approach in order to demonstrate that biodiversity loss could be minimised and that site-specific mitigation measures could be undertaken by farmers, scientists and advisors working in partnership together in a catchment that had been highly modified by Sitka spruce plantations. This approach was implemented during the operational phase of the Inagh EIP and supported local participating farmers to stay farming while bringing about catchment-scale improvements in biodiversity and water quality. Initial engagement in the process took place via an “Expression of Interest” process (please see Appendix 9) with a very clear “Criteria of Selection” for farmers / forestry owners to become involved in the Inagh EIP (please see Appendix 10). The work of the Inagh EIP focused on a 20-month implementation programme (June 2021 to March 2023) of a locally led collaborative partnership. Farmers has been centrally involved in the co-design and implementation of an innovative suite of measures (please see Appendix) please see , to address biodiversity loss, habitat fragmentation and water quality concerns identified in planning for this EIP over the past two years (Mar. 2019 to Mar. 2021).
- 4.3 Operational Area:** The Inagh EIP operational area was located in the parishes of Kilmaley and Inagh, specifically the townlands of Ballynoe, Cloontabonniv, Feighroe and Drumatehy in Kilmaley, and Formoyle Oughteragh West in West Clare. The project’s operational area (please see Appendix 2 – Maps No 1, 2, & 3) is dominated by Mount Callan, the highest mountain of West Clare and where the Inagh River rises. The project operated in an area with numerous streams, tributaries, springs and included numerous lakes. All land and waterbodies on which the Inagh EIP operated and on which work was carried out feed into the Inagh River.
- 4.4 Delivering on Project Objectives:** The Inagh EIP supported local farmers and the wider local community to address the challenge of biodiversity loss and the loss of high-status water bodies. It did so through the delivery of a large suite of measures, addressing habitat fragmentation, enhancing farm, bog and riparian biodiversity while simultaneously implementing catchment sensitive measures to improve water quality in the Upper Inagh River.
- 4.5 Delivering on Specific Aims:** During the operational phase of the project, the following aims were delivered:
- Developed and delivered a collaborative model to identify key farmland, forestry and water quality concerns impacting biodiversity, water quality and habitat loss.
 - Developed and delivered a comprehensive training and capacity building programme for local farmers / forestry owners and the wider local community (please see Appendix 1.3, 1.4, 1.5, 1.6, 1.7, 1.8).
 - Achieved and delivered on a real collaborative partnership through the co-design of a suite of mitigation measures (please see Appendix 1.1, 1.2, 1.3, and Appendix 3, 9, 10, 11.1, 11.2)
 - Completed a detailed local biodiversity audit on participating farms for monitoring purposes (please see Appendix 1.2, 3 and Appendix 11 – 11.1 & 11.2).

- Completed farm assessments and developed EPA PIP maps (Pollution Impact Potential) to ensure the delivery of the right measures are in the right place (please see Appendix 12)
- Implemented a broad suite of measures to support biodiversity in conjunction with local landowners and external parties (please see Appendix 1.2, 3, 11.1, and 11.3).
- Shared best practice of the work undertaken by the Inagh EIP on an ongoing basis in order to effectively communicate the achievements of local farmers as widely as possible. This was achieved via farm demo days, community outreach work, environmental education events, Heritage Week events, seminars, workshops and project networking at a local, regional and national level (see Appendix 1.1, 1.4, 1.5, 1.6, 1.7, 1.8 & 1.9).
- Developed and delivered a community outreach programme to raise awareness of local biodiversity and to build local capacity to support greater level of local involvement (please see Appendix 1.4, 1.5, 1.8 & 1.9)

4.6 The Monitoring Process Delivered: During the operational phase of the Inagh EIP, project monitoring and on-site monitoring (of implemented measure) took place from the 3rd Quarter of 2021 and continued for the duration of the project. The monitoring work was supported by clear reporting lines to the Inagh EIP Operational group and the Locally Led Section of the DAFM. An end of project review took place in 4th Quarter of 2022 and into the 1st Quarter of 2023. This included a review of key milestones and was reported to scheduled meetings of the Inagh EIP OG and to the DAFM. This work was undertaken by River Catchment Ecosystem Services Limited to ensure that all agreed project action were fully implemented in a timely and professional manner to ensure full project compliance with the funding agreement with the DAFM.

4.7 What Project Actions Were Delivered: The Inagh EIP focused on the delivery of a suite of practical on-farm measure and actions, which had been co-designed and co-developed by local farmers and members of the Inagh EIP OG. The measures helped to address biodiversity loss and habitat fragmented on 14 farms / areas of forestry, with other measures undertaken within the wider community. The suite measures included measures to enhance local biodiversity and improve water quality (instream and riparian biodiversity) in conjunction with local landowners, the Inagh EIP OG, River Catchment Ecosystem Services Limited and various external parties.

Inagh EIP Project Actions & Project Activities Delivered: 01/07/2021–31/03/2023

Established “River Catchment Ecosystem Services Limited” as a company limited by guarantee to implement the Inagh EIP after the withdrawal of the Inagh River Catchment Management Association from this role.
Establish all Inagh EIP procedures, governance structures and policies (OG TOR, Conflict of Interest policy, GDPR policy, Expression of Interest (EOI) process, Criteria of Farmer Selection, financial procedures, etc.
Prolonged process of engagement with local farmers / forestry owners and the recruitment of farmers / forestry owners to be part of the Inagh EIP based on an Expression of Interest process.
Detailed process to review, assess and sign-up farmers / forestry owners to be part of the Inagh EIP ensuring full transparency and effective lines of communication.
Baseline biodiversity assessments undertaken on designated sites through the operational area of the Inagh EIP

Inagh EIP Project Actions & Project Activities Delivered: 01/07/2021–31/03/2023

During the operational phase of the project, the following project actions were delivered:
- Pond networks (with pocket wetlands and inceptor ponds) established on 8 Inagh EIP farms

<ul style="list-style-type: none"> - Buffer zones established (and / or widened) on 11 farms to address water quality concerns and enhance riparian biodiversity – approximately 5,200 trees planted - Setback areas / riparian zones reviewed and assessed and riparian buffer zones (with native broadleaf trees) for biodiversity gain and water protection purposes - approximately 5,200 trees planted - Review, plan and install silt traps to proactively keep silt out of streams and rivers on 8 Inagh EIP farms - Substantial new native woodland areas established on 11 Inagh EIP farms - approx. 5,200 trees planted - Farm roads cambered on 4 farms to break pathways for overland flow (Source Pathway Receptor) and address water quality concerns by breaking existing pathways from source to the receiving watercourse.
<p>Full monitoring programme undertaken on the implementation of measures and the success of the implementation, success of measure on the ground.</p> <p>Full assessment undertaken of the key performance indicators (KPIs) set for the Inagh EIP</p>
<p>Undertook a highly successful official launch of the Inagh EIP – undertaken during COVID-19</p> <p>Established Inagh EIP social media presence</p>
<p>Delivered a highly successful Ministerial Visit – by Minister of State Pippa Hackett</p>
<p>Delivered multiple demo days / workshop in 2021, 2022 and 2023.</p>
<p>Delivered a highly successful “End of Project Seminar & Farm Demo Day” – 3rd Dec 2022</p>
<p>Delivered an end of Project Report</p>

4.8 Results Achieved and Recommendations Post Project Implementation:

- Practical biodiversity actions and co-designed measures implemented to address biodiversity loss and habitat fragmented on 14 farms / areas of forestry and within the wider community.
- A suite of forestry and farm measures delivered, supporting enhanced local biodiversity and improved water quality (focused on riparian biodiversity) in conjunction with local landowners, the OG and external parties
- Habitats and biodiversity corridors expanded and reconnected on various farms
- Increased farmer, forestry owner and local community awareness of biodiversity in the Upper Inagh
- Participation by 14 farmers / forestry owners and the local community in practical biodiversity training.
- Delivered a collaborative partnership model, which was not only developed locally but was seen to be working to address biodiversity loss, forestry and water quality concerns.
- The collaborative nature of the partnership seen through the co-design of the suite of mitigation measures and its demonstrated work to address local biodiversity loss.
- Delivered a comprehensive community outreach programme within the wider community to enhance awareness of biodiversity and local habitats.

4.9 Delivering Innovation Across All Aspects of the Inagh EIP: The Inagh EIP delivered a highly innovative bottom-up collaborative approach to biodiversity loss and habitat fragmentation in the Upper Inagh River Catch in a short period of time. It did so via a suite of biodiversity and catchment-sensitive farming measures and mitigation measures. The following areas of innovation were the cornerstone to the highly successful Inagh project delivery:

Innovation In Approach: The Inagh EIP OG brought together a highly committed, experienced, and multi-skilled body of scientists, advisors working with farmers and forestry owners. It included representation from the farming sector, agri-business, state agencies, local authorities and the 3rd level educational sector.

Putting Theory Into Practice: The Inagh EIP did not only work to address the challenge of biodiversity loss but also worked extremely hard to put in place a meaningful suite of on-farm measures, easily replicable, bringing innovation to the Upper Inagh River catchment. This work has greatly assisted the further refinement of mitigation measures, to ensure farmers get 'the right measure in the right place' to address water quality concerns, biodiversity loss and habitat fragmentation.

Section 5

5.1 Inagh EIP – Delivered Project Actions & Delivered Key Project Milestone (Continued): The following table provides an overview of when key milestones and project actions were delivered:

Project Management	Pre-Project Planning (Pre DAFM-Approval)	Project Operational Phase (With DAFM Approval of EIP Application)												Post Project Phase			
	2022										2023						After
	Jan /Feb	Mar/ Apr	May/ Jun	Jul/ Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	After
Agree & implement Community biodiversity measures	Community outreach programme / local citizen science programme	■	■	■	■	■	■	■	■	■	■						
	Block, where possible, existing drains on Clontabonniv bog (with silt traps, slow-flow dams) to enhance the biodiversity value of the Clontabonniv Community bog walk.					■	■	■	■								
	Conduct otter survey work (catchment wide – Upper Inagh Catchment) & install artificial otter holt (x1) and / additional artificial otter holt if additional suitable sites are identified				■												
	Implement other local community focused biodiversity action planning measures				■	■	■										
Capacity Building / Demo Events and Shared Learning	Have an official project launch						■										
	Present project outcomes (while ongoing) at 1 farm demo day / 1 forestry demo day and 1 community demo day						■				■						
	Have community biodiversity day on the bog walk Clontabonniv bog in May 2022																
	Develop suite of policy recommendations and a local action plan for an expanded Locally Led Project focused on the work of the Inagh EIP																
EIP Review and DAFM reporting and OG reporting	Monitor the implementation of measures & their success - Assess against agreed KPIs							■	■	■	■						
	Deliver Mid-Term Review							■									
	Deliver End Project Review & Report																
	Deliver End of Project Workshop																
EIP Project Management	Recruit a professional project team (incl. p/t Project Coordinator)	■	■	■													
	Establish the social media presence of the Inagh EIP & create web presence with Inagh River Catchment Management Association		■	■	■	■											
	Coordinate all EIP OG meetings (online and when / where possible physically)	■	■	■	■	■	■	■	■	■	■						
	Liaise with DAFM and other relevant EIP and network with other relevant projects in Co. Clare, in the SW and elsewhere.	■	■	■	■	■	■	■	■	■	■						

Section 6 – Full Set of Appendixes

Appendix No. 1 – Inagh EIP – Images of Project Delivery: Appendix No. 1.1 – Project Launch (26th November 2023):



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.2 –Delivery of Project Actions:



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.2 –Delivery of Project Actions (continued)



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.2 –Delivery of Project Actions (continued)



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.3 – Inagh EIP Farmer Meetings (on site) and hosted by Inagh EIP farmers



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.3 – Inagh EIP Farmer Meetings (on site) and hosted by Inagh EIP farmers (continued)



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.4 – Demo Days - Organised by the Inagh EIP and hosted by Inagh EIP farmers



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.4 – Demo Days - Organised by the Inagh EIP and hosted by Inagh EIP farmers (continued)



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.4 – Demo Days - Organised by the Inagh EIP and hosted by Inagh EIP farmers (continued)



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.5 – Community Outreach & Heritage Week Events - Organised & Hosted by the Inagh EIP



Above - Images of Inagh EIP Heritage Week Event 2021 – Hosted by participating Inagh EIP farmer



Above - Images of Inagh EIP Heritage Week Event 2022 – Hosted by participating Inagh EIP farmer

Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.5 – Community Outreach Events In the Wider Inagh River Catchment with Inagh EIP Involvement



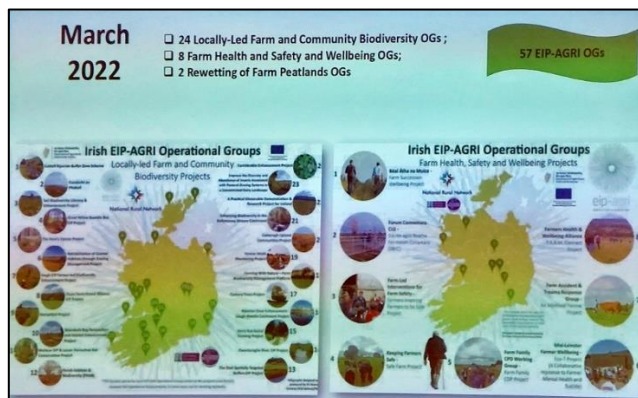
Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.6 –Networking by the Inagh EIP (off site) with other local projects incl. other Clare based EIPs:



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.7 –The Inagh EIP presenting and/ or networking at regional / national EIP events in 2021 & 2022

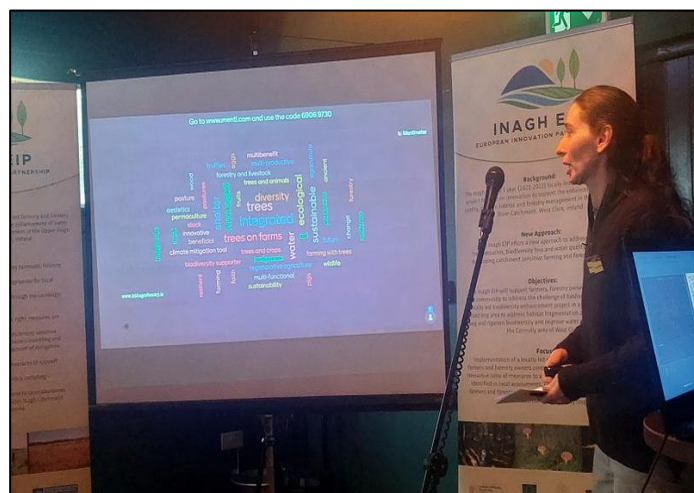
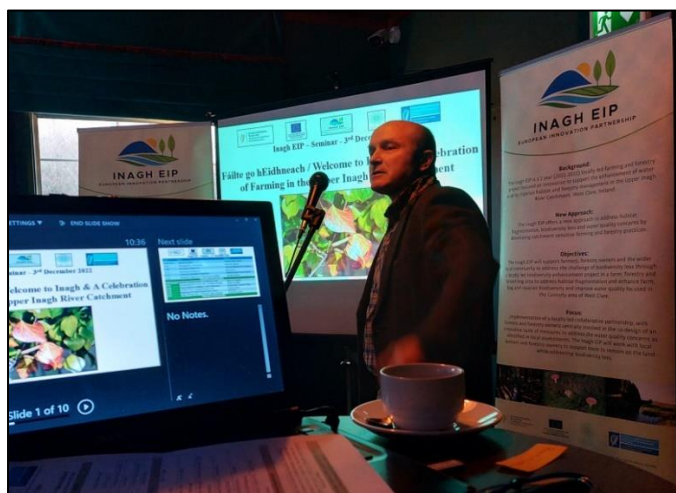


Above - Images of the Inagh EIP networking at the Burren Winterage School (Oct. 2021) and presenting on a EIP panel discussion group at the National EIP Conference in Athlone (Nov. 2022) organised by the NRN and the DAFM

Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.8 –The Inagh EIP Closing Seminar & Demo Day – 3rd December 2022

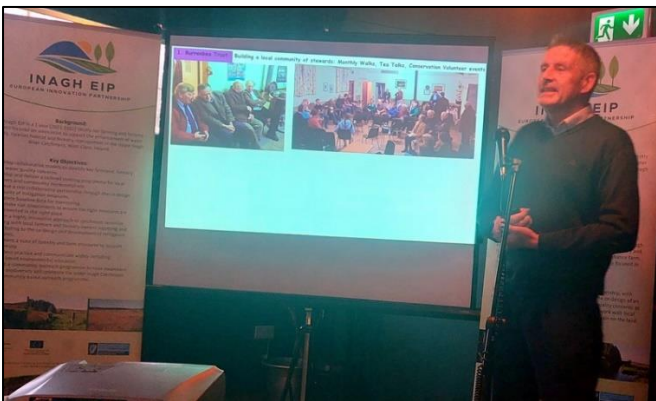
10:30	Item	Speaker
Session No 1	Opening Remarks	Minister Pippa Hackett
10:40	The Inagh EIP – An Overview	Ruairi Ó Conchúir
11:00	The Farmers Perspectives	Diarmaid McMahon & Tom Burke
11:10	The Foresters Perspective	Brian Harvey
11:15	A Social & Community Perspective	Brid McGough & Noel Carmody
11:20	Farming For Nature in Co. Clare & across Ireland	Brendan Dunford
Followed by Discussion Q&A		
11:40	Shanakyle Bog Restoration - An Option for Clare	Barry O' Loughlin
11:50	Incorporating Trees on the Land - An Option for Inagh	Ragna Gruendler
12:00	Pond Creation for amphibians - IForUT plantations	Ronan Boyle with Martin O' Shea
12:10	ACRES & New Cooperation Project Areas	Kristina Feeney
12:20	Supporting Farming in Marginal Areas: DAFM	John Carty
12:35	Inagh EIP What Next? A Vision For Inagh Catchment	Ruairi Ó Conchúir
Followed by Discussion Q&A		



Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.8 –The Inagh EIP Closing Seminar & Demo Day – 3rd December 2022 (continued)

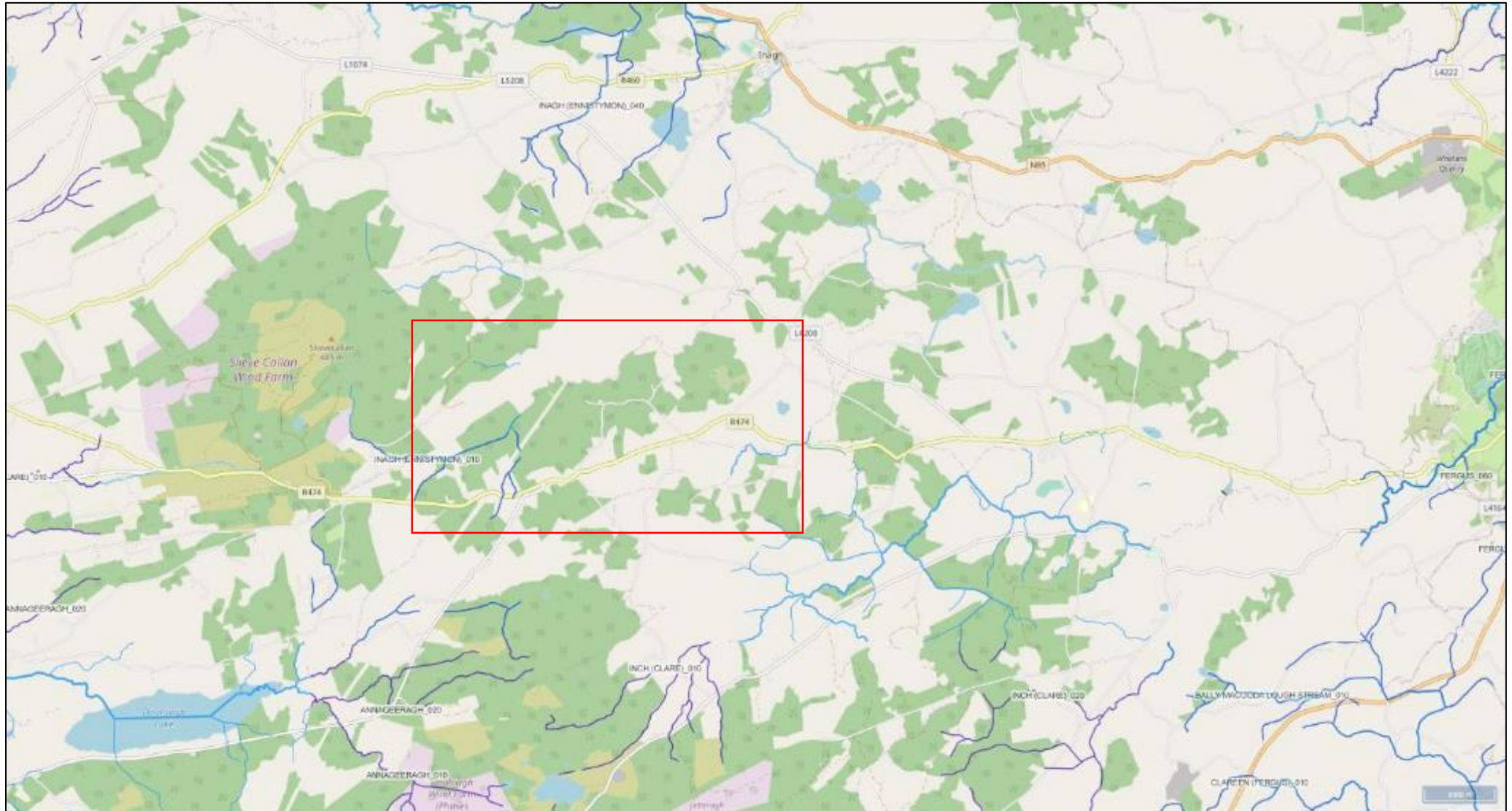


Appendix No. 1 – Inagh EIP – Images of Project Delivery:

Appendix No. 1.9 – Important visitors to the Inagh EIP

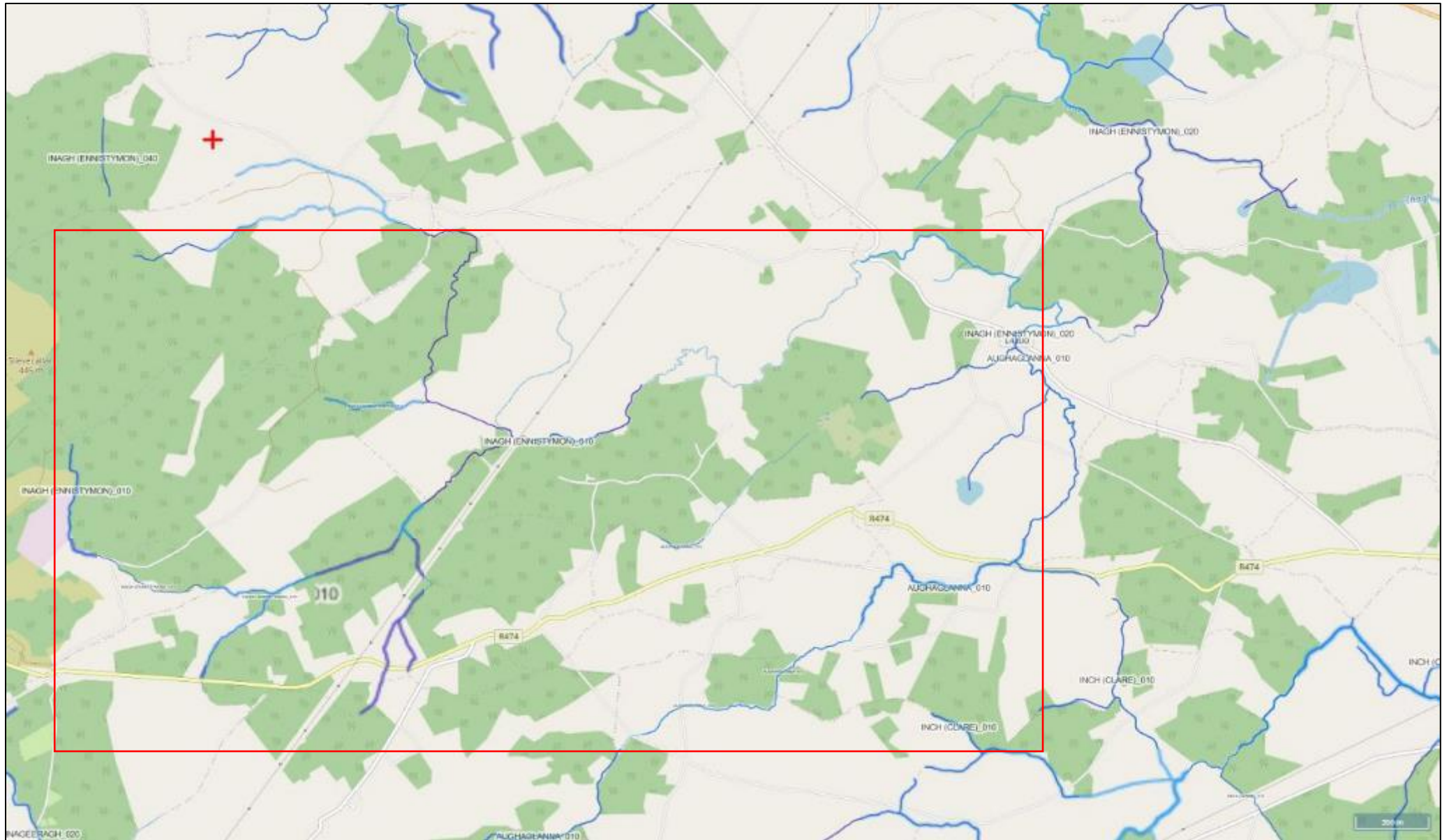


Map No. 2.2



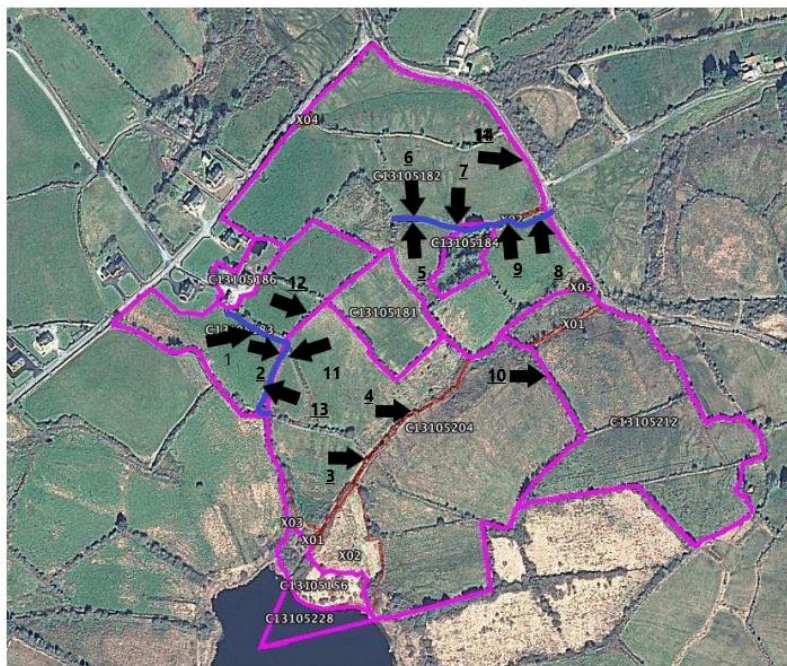
Map No. 2.2 - Inagh EIP Operation Area in the context of West Clare (Source: EPA – www.catchments.ie)

Map No. 2.3



Map No. 2.3 – Focus area of the Inagh EIP (Source: EPA – www.catchments.ie)

Appendix No. 3 – On Farm Implementation of Measures – Sample of Farm Plan (Inagh EIP farmer – Code: NC)



Map No 3.1: Farm Map of Measures Implemented By Participating Inagh EIP Farmer (Code NC)
 See details of measures below as per numbers listed on this map

Water Quality, Biodiversity & Habitat Enhancement Measures Undertaken by participating Inagh EIP (Code NC) (Nov. 2021 to March 2023)			
Item No	Details: Description of measure implemented	Length in metres	Benefit from: Water Quality / Biodiversity / Habitat Enhancement
1	Fence back a minimum of 1m from the stream flowing into the Derrygarrive Lake	136	Decrease amount of silt washing into the lake, Keep livestock away from stream
2	Install Silt Trap	1	Trap silt from washing into lake
3	Desilt the stream coming from the Derrygarrive Lake	25	Improve flow in outlet stream from the lake
4	Cut overhanging branches letting light into stream	200	Do tunnel the impact of tunnelling to let light into the stream
5	Fence 1m from stream	73	Keep livestock away from stream
6	Fence 1m from stream	73	Keep livestock away from stream
7	Open up existing pond , Desilt	20	Enhance biodiversity at pond
8	Install new fence a minimum of 1m back from stream edge & desilt the build-up of silt	80	Trap silt from washing into stream
9	Install Silt Traps	1	Trap silt from washing into stream
10	Move trough away from the stream side	30	Prevent livestock from walking beside stream to access trough
11	Install new trough (water point for cattle)	1	Prevent livestock from walking across stream to access water
12	Planting of Silver Birch Trees	40	Create riparian habitat / biodiversity corridor
13	Planting of Silver Birch Trees	15	Create riparian habitat / biodiversity corridor
14	Planting of Silver Birch Trees	19	Create riparian habitat / biodiversity corridor



Appendix No. 4 – SWOT Analysis of the Inagh EIP Project

Projects within the Open Call No 5 of the DAFM's EIP programme were designed to introduce desirable environmental change and also improvement in the knowledge and capacity for engagement of local actors in future environmental actions. The Inagh EIP undertook an end of evaluation as it was deemed critical for Inagh EIP Project to take stock not only of the extent of the change which had occurred during the operational phase of the Inagh EIP but also in relation to the objectives, and to assess the strengths, weaknesses, opportunities, and threats that have marked the two-year implementation phase. This was seen a key tool to plan and act effectively in the implementation of other work, including hopefully other open calls by the DAFM and potential involvement with the Water EIP. In the case of the end of the project evaluation, the SWOT analysis essentially provided a practical tool to explore both internal and external factors that have influenced the implementation of the Inagh EIP project.

The SWOT analysis was used to guide those involved in the implementation of the Inagh EIP to identify with key participants, namely key members of the Inagh EIP Operational Group, those directly involved with the implementation of the project, directors of River Catchment Management Ecosystem Services Limited, and participating Inagh EIP farmers / forestry owners, to review strengths and weaknesses, as well as broader opportunities and threats. This was done from an internal and external perspective. The work has assisted in developing a fuller awareness of the situation context in which the Inagh EIP project was implemented. It has also greatly assisted in understanding the strategic planning and decision-making process regarding various elements around the implementation / non-implementation of aspects of the Inagh EIP.

The SWOT analysis was used as a tool in the evaluation due to its simplicity and application to LIFE+ projects and especially one involving a wide variety of role-players who were engaged at various levels of operation. It was clear from the SWOT analysis that a very significant range of positive forces have merged and worked together to greatly enhance the rate and level of delivery of the LIFE project. Equally it is clear that problems which emerged at the outset of the project should have been recognised sooner and addressed in a more comprehensive manner rather than allowing them to become a real threat to key aspects of the project.

Appendix 4 - Inagh EIP Project SWOT Analysis (Nov. 2021 to March 2023)

<p><u>Strengths:</u> What did Inagh EIP Project do well? What did you see as the strengths of the Inagh EIP? What resources did the Inagh EIP Project draw on?</p> <ol style="list-style-type: none"> 1. Years of experience in West Clare & real active partnership on the ground 2. Expertise – scientific, project management, environmental 3. Clear support and commitment to a locally led bottom-up approach 4. Contacts / Knowledge of structures & of government 5. Inagh EIP OG are well respected at local & national level 6. High media / political profile & Networking ability 7. Committed OG members / Experience of OG members 8. Experience of running EIP type project / EU LIFE projects 9. Political awareness and savviness of dealing with key role players 10. Structure of the Inagh EIP built around the local farming community 11. Water quality / biodiversity enhancement as a key pillar of the Inagh EIP yet addressing a cross sections of issues – environment / agriculture /forestry. 12. Support of support of local community / support of local schools 13. Positive public perception on the ground of the Inagh EIP 14. Positive public perception of the measures delivered by the Inagh EIP 15. Unrestricted access to farms on the Inagh River due to landowner goodwill 16. Support of landowners in the wider Inagh Catchment 17. Quality demonstration sites developed as part of the Inagh EIP 	<p><u>Weaknesses:</u> What could we do to improve the implementation of DAFM’s EIP type projects What are the key gaps that Locally Led (EIP type) projects need to fill</p> <ol style="list-style-type: none"> 1. Not having enough time / start time 2. Structure of Inagh EIP Operational Group 3. Some Operational Group members perceived as weakness 4. Lack of support from relevant state agencies 5. The unknown – the new CAP / ACRES programme 6. Does the Inagh EIP need to better represent partners from various locally based socio-economic sectors in the wider Inagh Catchment. 7. Retaining and up-skilling participating farmers / forestry owners 8. Variable levels of skill and interest of participants 9. Capacity to deal with increased bureaucratic workload related to the DAFMs’ Locally Led programme with EIPs 10. The Inagh EIP not having a direct link to a CE Scheme or access to RRS workers and not having the ability to sponsor / co-sponsor 11. Lack of clarity from regulatory bodies 12. Joined-up thinking absent for Climate Action funding & the role of farmers 13. Water quality & biodiversity issues need to be placed back on national agenda
<p><u>Opportunities:</u> What opportunities are open to the Inagh EIP? What opportunities could the Inagh EIP take advantage of?</p> <ol style="list-style-type: none"> 1. Engagement of Water Framework Directive / importance of water quality 2. Catchment management as a science and link with EPA 3. New ACRES programme with a strong environmental element 4. New Water EIP and catchment management plan for the Inagh Catchment 5. Enhanced integration of water & climate action 6. Willing support of EIP Inagh participating farmers / forestry owners 7. Expertise in integrated catchment management, farming, and agri-environment 8. Government legal obligations (RBMP, WFD and priority habitats) 9. Local Support (farming / public / political) 10. Link back into the local economy - farmers supporting conservation measures in the own area & link back into the local area 11. Engagement with other EIP projects / networking with others (Clare & elsewhere) 12. Development of template of mitigation measures for river courses across the Inagh 13. Positive mental health link to outdoor engagement in practical conservation work 14. Developing local catchment management plan for the Inagh Catchment (RBMP) 	<p><u>Threats:</u> What threats could impact on the Inagh EIP? What other external factors could impact?</p> <ol style="list-style-type: none"> 1. Stakeholder disengagement on water quality measures / biodiversity measures 2. Lack of joined-up thinking and lack of integrated support 3. Red-tape and bureaucracy 4. No national conservation plan for land use change for climate action 5. No current integrated approach for water quality in forestry areas like Upper Inagh 6. Lack of holistic landscape management and landscape policy 7. Upland developments, windfarms/forestry and intensification of farming 8. Lack of development of conservation management plan in SAC / SPA areas 9. Loss of scientific expertise 10. Down turn in the economy

Appendix No. 5: Inagh EIP – End of Project Attitudinal Survey of Participants Project



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine



Inagh EIP – End of Project Attitudinal Survey of Participants

Question No 1 - What is Your Role on the farm	Your Response
Full-time principal farmer	
Part-time principal farmer	
Farm Manager	
Other	

* The term 'role on the farm' is used to denote whether the interviewee is the principal farmer (either full-time or part-time), the farm manager, or fulfils another role.

Question No 2 – Farm Type	Your Response
Dairying (specialist milk production)	
Cattle Rearing (specialist cattle-rearing and fattening)	
Sheep (specialist sheep / sheep and cattle combined)	
Forestry (incl. agroforestry)	
Other	

Question No 3 – Farm Size (land area band)	Your Response
Less than 10 ha	
10-25 ha	
25-50 ha	
50-100 ha	
More than 100 ha	

Question No 4 – Land Tenure	Your Response
Land mainly owned	
Land mainly rented / leased on contract or other	
Other (commonage)	

Question No 5 – Age Profile (age band)	Your Response
Under 25	
25-44	
45-64	
65+	

Question No 6 – Formal education (main decision-maker)	Your Response
University degree and above	
Diploma or certificate	
School education up to the age of 16	
School education up to the age of 14-15	
Don't know / Do not wish to answer	

Question No 7 – Farm Income Statement	Your Response
Farming provides less than 50% of my household income	
Farming provides more than 50% of my household income	
Farming provides 100% of my household income	
Don't know / Do not wish to answer	

Question No 8 – Level of Experience (main person responsible for making farm decisions)	Your Response
0-5 years	
6-10 years	
11-20 years	
20+ years	

Question No 9 – Has a successor been identified	Your Response
Yes	
No	
Uncertain	

Question No 10 - Engagement with past environmental management actions and schemes (before entering the Inagh EIP)	Your Response
Rural Environment Protection Scheme 1994-1999 (REPS1)	
Rural Environment Protection Scheme 2000-2004 (REPS2)	
Rural Environment Protection Scheme 2004-2006 (REPS3)	
Rural Environment Protection Scheme 2007-2009 (REPS4)	
Schemes supported by National Parks and Wildlife Service	
AEOS	
GLAS	
Other	
None	

Question No 11 - Reasons for joining the Inagh EIP (Rank 1 to 11 – 1 being top reason)	Your Response
It was worthwhile / payment levels were good	
Scheme was straight forward and not too complicated	
No fear of inspections associated with the Inagh EIP	
I was eligible in terms of the 'Expression of Interest' process and the 'Selection Criteria'	
It was suitable / it fitted with my farming system / I did not need to change my farm practices too much / there was no significant land involved in it	
It was very little hassle	
It was not very time consuming	
I had enough details on the Inagh EIP / the proposed 'Project Measures' were clear	
The Inagh EIP was well launched / it did not involve me making too many changes / it didn't involve me making a long-term commitment	
I was happy about the environmental benefits of my selected measures	
There was good local engagement / open and transparent selection process for joining	

Question No 12 - Have you applied to join ACRES	Your Response
Yes	
No	

Question No 13 – If you have not applied to join ACRES what are your reasons	Your Response
Not worthwhile / payment levels are too low	
Scheme is too complicated	
Fear of inspections	
Not eligible	
Not suitable / did not fit with farm set-up / no need to change / no land for it	
Too much hassle	
Too time consuming	
Not knowing enough details	
Scheme badly launched/too many changes required/don't like long-term commitment	
Sceptical about the environmental benefits of the actions	
Unaware of the ACRES scheme	

Question No 14 –Environmental actions carried out previously within any scheme or on a voluntary basis (before the Inagh EIP)	Your Response
Arable grass margins	
Maintenance of traditional hay meadows	
Reduced cultivation of soils	
Species rich grassland / Low input permanent pasture	
Green cover crops (catch crops)	
Management of commonages	
Protection of watercourses (margins, buffer zones, keep animals out of watercourses)	
Planting hedgerows or trees	
Low emission slurry spreading	
Create or manage habitats for birds, bats, bees, etc.	
Restrict the use of pesticides & fertilisers in / around hedgerows, lakes, ponds, rivers & streams	
Protect features of historical and archaeological interest	
Maintain and manage farm and field boundaries (hedgerows, stone walls)	
Nutrient management planning	
Obtaining advice or training on environmental issues relating to farming	
Other	

Question No 15 – Outside of Acres and ACRES CP, how likely is it that you would join a specific agri-environment scheme for the Inagh River Catchment focused on an expansion of the measures within the Inagh EIP	Your Response
Not at all likely	
Not likely	
Neither likely or unlikely	
Likely	
Very likely	
Don't know	

Question No 16 - To what extent do you agree with the following statements?	1. Strongly Disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly Agree
All farmers should manage some of their land for environmental objectives e.g. water quality, biodiversity enhancement, protect habitats.					
Achieving a good quality of life is more important to me than maximising income from my farm.					
Environmental problems resulting from agricultural activities are exaggerated by the media.					
Any loss of agricultural income due to conservation of nature should be fully compensated by the government.					
I am always looking to learn new skills and knowledge that I can apply to my farm.					
I am keen to apply new technology on my holding.					
I am happy to take advice about managing the natural environment on my farm.					
My awareness of actions to address environmental issues has increased due to participation in the Inagh EIP					
My awareness of actions to address environmental issues has increased due to participation in past agri-environment schemes e.g. REPS / NWPS					
I plan to implement measures in the future to address environmental issues (beyond the Inagh EIP scheme).					

Question No 17 – An expanded locally led agri-environmental scheme is needed for the Inagh River Catchment focused specifically on water quality, biodiversity enhancement and habitat protection?	1. Strongly Disagree	2. Disagree	3. Neither agree nor disagree	4. Agree	5. Strongly Agree
Do you agree with this?					
Q. No 18 – Given your experience of the Inagh EIP, would you join an expanded locally led agri-environmental scheme for the Inagh River Catchment focused specifically on water quality, biodiversity enhancement and habitat protection?	Your Response				
Yes					
No					

Question No 19 – Given your experience of the Inagh EIP, would you like to continue to undertake measures focused specifically on water quality, biodiversity enhancement and habitat protection in the Inagh River Catchment?	Your Response
Yes	
No	

Appendix No. 6: Inagh EIP – Word Cloud

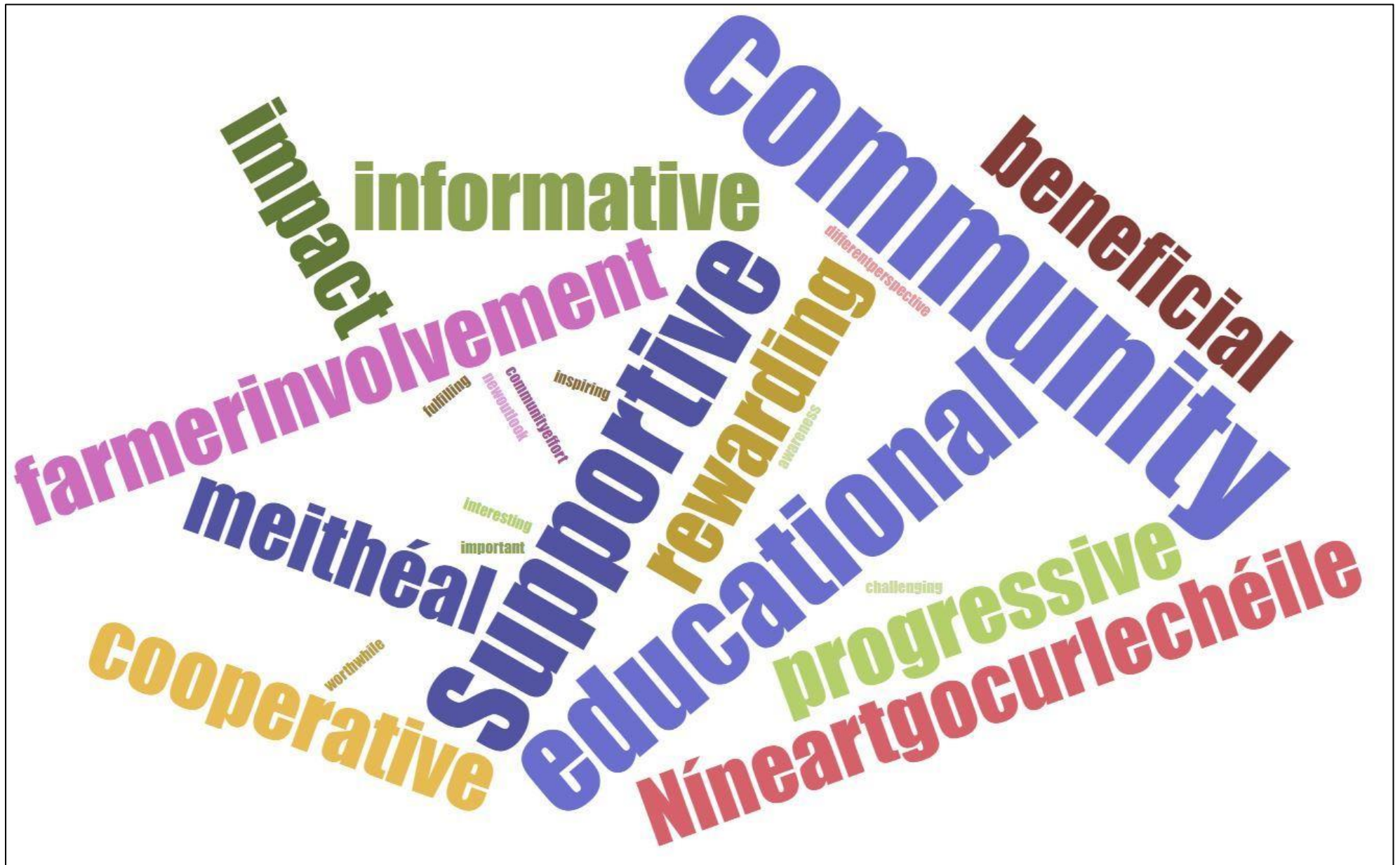


Figure No. 1: Inagh EIP Word Cloud - based on the results of the Attitudinal Survey (Appendix No. 5) of farmers / forestry owners involved in the Inagh EIP and first presented at the Inagh EIP seminar – 3rd December 2023

Appendix No. 7: Inagh EIP - General Data Protection Policy (GDPR Policy 18/10/2021)

1. INTRODUCTION

1.1 Background to the General Data Protection Regulation (GDPR)

The General Data Protection Regulation 2016 replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its purpose is to protect the “rights and freedoms” of natural persons (i.e. living individuals) and to ensure that Personal Data is processed in line with data protection principles and on a lawful basis (the “GDPR”)

1.2 This Data Protection Policy sets out Inagh EIP’s commitment to protecting the rights and privacy of individuals and details how we will ensure compliance with the GDPR and Irish data protection legislation.

1.3 Interpretation - The defined terms used in this policy shall have the meanings given to them in Schedule 1 (Definitions) and in the GDPR. (See pages 18 to 20).

2. POLICY STATEMENT AND SCOPE

2.1 The Inagh EIP recognises that the correct and lawful treatment of Personal Data will maintain confidence in the Inagh EIP and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times.

2.2 Material scope (Article 2) – the GDPR applies to the processing of Personal Data wholly or partly by automated means (i.e. by computer) and to the processing other than by automated means of Personal Data (i.e. paper records) that form part of a filing system or are intended to form part of a filing system.

2.3 Territorial scope (Article 3) – the GDPR will apply to all Data Controllers that are established in the EU who process the Personal Data of Data Subjects, in the context of that establishment. It will also apply to controllers outside of the EU that process Personal Data in order to offer goods or services (irrespective of payment), or monitor the behaviour of Data Subjects in the EU.

2.4 The Inagh EIP, located at Doctors Hill, Kilfenora, Co Clare is committed to compliance with all relevant EU and Member State laws in respect of Personal Data, and the protection of the “rights and freedoms” of individuals whose information the Inagh EIP collects and processes in accordance with the GDPR.

2.5 Compliance with the GDPR is described by this Policy and the Related Policies, along with connected procedures.

2.6 The GDPR and this Policy apply to all of the Inagh EIP’s Personal Data processing functions, including those performed on customers’, clients’, employees’, suppliers’ and others’ Personal Data, and any other Personal Data the Inagh EIP processes from any source.

2.7 The DPO is responsible for ensuring the review of the register of processing activities regularly in the light of any changes to the Inagh EIP’s activities (as determined by changes to the data inventory register and the management review) and to any additional requirements identified by means of data protection impact assessments. This register needs to be available on the supervisory authority’s request.

2.8 This Policy applies to all Inagh EIP Personnel. Any breach of the GDPR and/or the Related Policies will be dealt with under the Inagh EIP’s disciplinary policy and may also be a criminal offence, in which case the matter will be reported as soon as possible to the appropriate authorities.

2.9 No third party may access Personal Data held by the Inagh EIP without having first entered into a data processing agreement, which imposes on the third party obligations no less onerous than those to which the Inagh EIP is committed, and which gives the Inagh EIP the right to audit compliance with the agreement.

2.10 Please contact the DPO with any questions about the operation of this Policy or the GDPR or if you have any concerns that this Policy is not being or has not been followed. In particular, you must always contact the DPO in the following circumstances:

- 2.10.1 if there has been a Personal Data Breach;
- 2.10.2 if you need any assistance dealing with any rights invoked by a Data Subject;
- 2.10.3 if you need help with any contracts or other areas in relation to sharing Personal Data with third parties (including our vendors);
- 2.10.4 if you are unsure of the lawful basis which you are relying on to process Personal Data;
- 2.10.5 if you need to rely on Consent and/or need to capture Explicit Consent;
- 2.10.6 if you need to draft privacy notices;
- 2.10.7 if you are unsure about the retention period for the Personal Data being processed;
- 2.10.8 if you are unsure about what security or other measures you need to implement to protect Personal Data;
- 2.10.9 if you are unsure on what basis to transfer Personal Data outside the EEA;
- 2.10.10 whenever you are engaging in a significant new, or change in, processing activity which is likely to require a DPIA or plan to use Personal Data for purposes others than what it was collected for;
- 2.10.11 If you plan to undertake any activities involving Automated Processing including profiling or Automated Decision-Making; or
- 2.10.12 If you need help complying with applicable law when carrying out direct marketing activities.

3. RESPONSIBILITIES AND ROLES UNDER THE GENERAL DATA PROTECTION REGULATION

- 3.1 In the majority of instances, the Inagh EIP will act as Data Controller and sometimes as Data Controller and Data Processor in relation to Personal Data however in some limited circumstances the Inagh EIP may act as Data Processor on behalf of another body/organisation.
- 3.2 The Inagh EIP is responsible for compliance with Data Protection Legislation and for being able to demonstrate such compliance.
- 3.3 The Inagh EIP are responsible for developing and encouraging good information/data handling practices in the EIP.
- 3.4 The DPO, a role specified in the GDPR, has the following tasks in relation to GDPR compliance:
 - 3.4.1 to inform and advise the Inagh EIP and Inagh EIP Personnel of their obligations in relation to Data Protection Legislation where they are involved in processing of personal data;
 - 3.4.2 to monitor compliance with the GDPR within the Inagh EIP. This duty shall involve providing information, advice and recommendations to senior management in relation to achieving GDPR compliance;
 - 3.4.3 to assist the Inagh EIP in carrying out DPIAs where necessary;
 - 3.4.4 to co-operate with the Irish Data Protection Commission where required;
 - 3.4.5 to act as the contact point for the Irish Data Protection Commission on issues relating to processing, including the prior consultation referred to in Article 36 of the GDPR, and to consult, where necessary, with regard to any other matter;
 - 3.4.6 to assist with and provide advice in relation to the preparation and implementation of policies and procedures put in place to demonstrate compliance with the Data Protection Legislation; and
 - 3.4.7 to at all times in the performance of its tasks take a risk-based approach and prioritise its activities and focus its efforts on issues that present higher data protection risks.
- 3.5 Compliance with Data Protection Legislation is the responsibility of all Inagh EIP Personnel who process Personal Data.
- 3.6 Training and awareness requirements for the Inagh EIP will be managed by the Project Manager.

3.7 Inagh EIP Personnel and the public are responsible for ensuring that any Personal Data about them and supplied by them to the Inagh EIP is accurate and up-to-date.

4. DATA PROTECTION PRINCIPLES

All processing of Personal Data must be conducted in accordance with the data protection principles as set out in Article 5 of the GDPR. The Inagh EIP's policies and procedures are designed to ensure compliance with the principles.

4.1 Personal Data must be processed lawfully, fairly and transparently.

Lawful – identify a lawful basis before you can process Personal Data. These are often referred to as the “conditions for processing”, for example legislative basis.

Fairly – in order for processing to be fair, the Data Controller has to make certain information available to the Data Subjects as practicable. This applies whether the Personal Data was obtained directly from the Data Subjects or from other sources.

The GDPR has increased requirements about what information should be available to Data Subjects, which is covered in the ‘Transparency’ requirement.

Transparently – the GDPR includes rules on giving privacy information to Data Subjects in Articles 12, 13 and 14. These are detailed and specific, placing an emphasis on making privacy notices understandable and accessible. Information must be communicated to the Data Subject in an intelligible form using clear and plain language.

The Inagh EIP's Privacy Statement will be provided to all parties.

The specific information that must be provided to the Data Subject must, as a minimum, include:

- 4.1.1 the identity and the contact details of the Data Controller and, if any, of the Data Controller's representative;
- 4.1.2 the contact details of the DPO;
- 4.1.3 the purposes of the processing for which the Personal Data are intended as well as the legal basis for the processing;
- 4.1.4 the period for which the Personal Data will be stored;
- 4.1.5 the existence of the rights to request access, rectification, erasure or to object to the processing, and the conditions (or lack of) relating to exercising these rights, such as whether the lawfulness of previous processing will be affected;
- 4.1.6 the categories of Personal Data concerned;
- 4.1.7 the recipients or categories of recipients of the Personal Data, where applicable;
- 4.1.8 where applicable, that the Data Controller intends to transfer Personal Data to a recipient in a third country and the level of protection afforded to the data; and
- 4.1.9 any further information necessary to guarantee fair processing.

4.2 Personal Data can only be collected for specific, explicit and legitimate purposes.

4.2.1 Data obtained for specified purposes must not be used for other purposes, save where the GDPR provides for same.

4.3 Personal Data must be adequate, relevant and limited to what is necessary for processing.

4.3.1 The Inagh EIP must not collect information that is not strictly necessary for the purpose for which it is obtained.

4.3.2 All data collection forms (electronic or paper-based), including data collection requirements in new information systems, must include link to privacy statement.

4.3.3 The DPO will ensure that the Data Protection Nominees in each section arrange, on a regular basis, for all data collection methods to be reviewed to ensure that collected data continues to be adequate, relevant and not excessive.

- 4.4 Personal Data must be accurate and kept up to date with every effort to erase or rectify without delay.
- 4.4.1 Personal Data that is stored by the Data Controller must be reviewed and updated as necessary. No data should be kept unless it is reasonable to assume that it is accurate.
 - 4.4.2 The Inagh EIP has a Data Retention Policy which explains that the Inagh EIP will follow the National Retention Policy for DAFM other than where specific, separate retention periods are required.
 - 4.4.3 The DPO, together with HR, will work together to ensure that all staff are trained in the importance of collecting accurate data and maintaining it.
 - 4.4.4 It is also the responsibility of the Data Subject to ensure that data held by the Inagh EIP is accurate and up to date. Completion of a registration or application form by a Data Subject will include a statement that the data contained therein is accurate at the date of submission.
 - 4.4.5 Inagh EIP Personnel should be required to notify the Inagh EIP in writing of any changes in circumstance to enable personal records to be updated accordingly. It is the responsibility of the Inagh EIP to ensure that any notification regarding change of circumstances is recorded and acted upon.
 - 4.4.6 The DPO will assist the Inagh EIP in ensuring that appropriate procedures and policies are in place to keep Personal Data accurate and up to date, taking into account the volume of data collected, the speed with which it might change and any other relevant factors.
 - 4.4.7 On a regular basis, the DPO will arrange for a review of the retention dates of all the Personal Data processed by the Inagh EIP, by reference to the data inventory, in order to identify any data that is no longer required in the context of the registered purpose. This data will be securely deleted/destroyed or archived in line with the Data Retention Policy and following issue of a certificate of destruction by the Inagh EIP's archivist.
 - 4.4.8 The DPO will have oversight for ensuring that requests for rectification from Data Subjects are responded to within one month. This can be extended to a further two months for complex requests. If the Inagh EIP decides not to comply with the request, the DPO will arrange for a response to the Data Subject to explain its reasoning and inform them of their right to complain to the supervisory authority and seek judicial remedy.
 - 4.4.9 The DPO will assist the Inagh EIP in making appropriate arrangements where third-party organisations may have been passed inaccurate or out-of-date Personal Data, to inform them that the information is inaccurate and/or out of date and is not to be used to inform decisions about the individuals concerned; and for passing any correction to the Personal Data to the third party where this is required.
- 4.5 Personal Data must be kept in a form such that the Data Subject can be identified only as long as is necessary for processing.
- 4.5.1 Where Personal Data is retained beyond the processing date, it will be *[minimised/encrypted/pseudonymised]* in order to protect the identity of the Data Subject in the event of a data breach. *[This is documented [where?]].*
 - 4.5.2 Personal Data will be retained in line with the Data Retention Policy and, once its retention date is passed, it must be securely destroyed or archived as described above.
 - 4.5.3 The Inagh EIP's archivist or records manager (in consultation with the DPO where necessary) must specifically approve any data retention that exceeds the retention periods referred to in the Data Retention Policy, and must ensure that the justification is clearly identified and in line with the requirements of the Data Protection Legislation. This approval must be written.
- 4.6 Personal Data must be processed in a manner that ensures the appropriate security.
- 4.6.1 The DPO will ensure that a risk assessment is carried out taking into account all the circumstances of the Inagh EIP's controlling or processing operations. Each section shall be responsible for their own risk assessment with the oversight of the DPO.
 - 4.6.2 In determining appropriateness, the Inagh EIP together with the DPO should also consider the extent of possible damage or loss that might be caused to individuals (e.g. staff or customers) if a security breach occurs, the effect of any security breach on the Inagh EIP itself, and any likely reputational damage including the possible loss of customer trust.
 - 4.6.3 When assessing appropriate technical measures, the Inagh EIP together with the DPO will consider the following:

- Password protection;
- Automatic locking of idle terminals;
- Removal of access rights for USB and other memory media;
- Virus checking software and firewalls;
- Role-based access rights including those assigned to temporary staff;
- Encryption of devices that leave the Inagh EIP's premises such as laptops;
- Security of local and wide area networks;
- Privacy enhancing technologies such as pseudonymisation and anonymisation;
- Identifying appropriate international security standards relevant to the Inagh EIP
- and any other measure it considers appropriate.

1.

4.6.4 When assessing appropriate organisational measures the Inagh EIP together with the DPO will consider the following:

- The appropriate training levels throughout the Inagh EIP
- Measures that consider the reliability of employees (such as references etc.);
- The inclusion of data protection in employment contracts;
- Identification of disciplinary action measures for data breaches;
- Monitoring of staff for compliance with relevant security standards;
- Physical access controls to electronic and paper based records;
- Adoption of a clear desk policy;
- Storing of paper based data in lockable fire-proof cabinets;
- Restricting the use of portable electronic devices outside of the workplace;
- Restricting the use of employee's own personal devices being used in the workplace;
- Adopting clear rules about passwords;
- Making regular backups of Personal Data and storing the media off-site; and
- The imposition of contractual obligations on the importing organisations to take appropriate security measures when transferring data outside the EEA; and
- Any other measure it considers appropriate.

These controls have been selected on the basis of identified risks to Personal Data, and the potential for damage or distress to individuals whose data is being processed.

4.7 The Inagh EIP must be able to demonstrate compliance with the GDPR's other principles (accountability).

4.7.1 The GDPR includes provisions that promote accountability and governance. These complement the GDPR's transparency requirements. The accountability principle in Article 5(2) requires the Inagh EIP to demonstrate that it complies with the principles and states explicitly that this is the Inagh EIP's responsibility.

4.7.2 The Inagh EIP will demonstrate compliance with the data protection principles by implementing data protection policies, adhering to codes of conduct, implementing technical and organisational measures, as well as adopting techniques such as data protection by design, DPIAs and breach notification procedures.

4.7.3 The Inagh EIP must implement appropriate technical and organisational measures in an effective manner, to ensure compliance with data protection principles. The Organisation is responsible for, and must be able to demonstrate, compliance with the data protection principles.

4.7.4 The Inagh EIP must have adequate resources and controls in place to ensure and to document GDPR compliance including:

- (1) appointing a suitably qualified DPO;
- (2) completing DPIAs where Processing presents a high risk to rights and freedoms of Data Subjects;
- (3) integrating data protection into internal documents including this Policy and Related Policies;
- (4) regularly training Inagh EIP Personnel on the GDPR, this Policy and Related Policies and data protection matters including, for example, Data Subjects' rights, Consent, legal basis, DPIA and Personal Data Breaches. The Inagh EIP must maintain a record of training attendance by Inagh EIP Personnel; and

- (5) Regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

4.7.5 Record Keeping

- (1) The GDPR requires the Inagh EIP to keep full and accurate records of all its data processing activities.
- (2) The Inagh EIP is required to keep and maintain accurate corporate records reflecting our processing including records of Data Subjects' Consents and procedures for obtaining Consents.
- (3) These records should include, at a minimum, the name and contact details of the Inagh EIP and the DPO, clear descriptions of the Personal Data types, Data Subject types, processing activities, processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place. In order to create such records, data maps should be created which should include the detail set out above together with appropriate data flows.

4.7.6 Training and Audit

- (1) The Inagh EIP is required to ensure all Inagh EIP Personnel have undergone adequate training to enable them to comply with data privacy laws. The Inagh EIP must also regularly test its systems and processes to assess compliance.
- (2) The Inagh EIP is required to undergo all mandatory data privacy related training and ensure all teams undergo similar mandatory training.
- (3) The Inagh EIP is required to regularly review all the systems and processes under its control to ensure it complies with this Policy and check that adequate governance controls and resources are in place to ensure proper use and protection of Personal Data.

4.7.7 Privacy by Design and Data Protection Impact Assessment (DPIA)

The Inagh EIP is required to implement Privacy by Design measures when Processing Personal Data by implementing appropriate technical and organisational measures (like pseudonymisation) in an effective manner, to ensure compliance with data privacy principles. The Inagh EIP must assess what Privacy by Design measures can be implemented on all programs/systems/processes that process Personal Data by taking into account the following:

- (1) the state of the art;
- (2) the cost of implementation;
- (3) the nature, scope, context and purposes of processing; and
- (4) the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the processing.

4.7.8 The Inagh EIP must also conduct DPIAs in respect to high risk processing.

- (1) use of new technologies (programs, systems or processes), or changing technologies (programs, systems or processes);
- (2) Automated Processing including profiling and Automated Decision Making;
- (3) large scale processing of Special Categories of Personal Data; and
- (4) large scale, systematic monitoring of a publicly accessible area.

4.7.9 A DPIA must include:

- (1) a description of the processing, its purposes;
- (2) an assessment of the necessity and proportionality of the processing in relation to its purpose;

- (3) an assessment of the risk to individuals; and
- (4) the risk mitigation measures in place and demonstration of compliance.

4.7.10 Automated Processing (including profiling) and Automated Decision-Making

Generally, Automated Decision Making is prohibited when a decision has a legal or similar significant effect on an individual unless:

- (1) a Data Subject has Explicitly Consented;
- (2) the Processing is authorised by law; or
- (3) the Processing is necessary for the performance of or entering into a contract.

4.7.11 If certain types of Special Categories of Personal Data are being processed, then grounds (b) or (c) will not be allowed but such Special Categories of Personal Data can be processed where it is necessary (unless less intrusive means can be used) for substantial public interest like fraud prevention.

4.7.12 If a decision is to be based solely on Automated Processing (including profiling), then Data Subjects must be informed when you first communicate with them of their right to object. This right must be explicitly brought to their attention and presented clearly and separately from other information. Further, suitable measures must be put in place to safeguard the Data Subject's rights and freedoms and legitimate interests.

4.7.13 The Inagh EIP must also inform the Data Subject of the logic involved in the decision making or profiling, the significance and envisaged consequences and give the Data Subject the right to request human intervention, express their point of view or challenge the decision.

4.7.14 A DPIA must be carried out before any Automated Processing (including profiling) or Automated Decision Making activities are undertaken.

4.7.15 Sharing Personal Data

- (1) Generally the Inagh EIP is not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.
- (2) Personal Data may only be shared with another employee, agent or representative of the Inagh EIP if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.

4.7.16 Personal Data held by the Inagh EIP may only be shared with third parties, such as our service providers if:

- (1) they have a need to know the information for the purposes of providing the contracted services;
- (2) sharing the Personal Data complies with the Privacy Statement provided to the Data Subject and, if required, the Data Subject's Consent has been obtained;
- (3) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- (4) the transfer complies with any applicable cross border transfer restrictions; and
- (5) a fully executed written contract that contains GDPR approved third party clauses has been obtained.

5. **CONSENT**

5.1 In general, the Inagh EIP does not rely on Consent as a legal basis for processing Personal Data however there are limited circumstances in which we will rely on Consent.

5.2 The Inagh EIP understands 'Consent' to mean that it has been explicitly and freely given, and a specific, informed and unambiguous indication of the Data Subject's wishes that, by statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her. The Data Subject can withdraw their Consent at any time.

- 5.3 The Inagh EIP understands ‘Consent’ to mean that the Data Subject has been fully informed of the intended processing and has signified their agreement, while in a fit state of mind to do so and without pressure being exerted upon them. Consent obtained under duress or on the basis of misleading information will not be a valid basis for processing.
- 5.4 There must be some active communication between the parties to demonstrate active Consent. Consent cannot be inferred from non-response to a communication. The Controller must be able to demonstrate that Consent was obtained for the processing operation.
- 5.5 For Special Categories of Personal Data, explicit written Consent of Data Subjects must be obtained unless an alternative legitimate basis for processing exists.
- 5.6 Where the Inagh EIP provides online services to children, parental or custodial authorisation must be obtained. This requirement applies to children under the age of 16.

6. DATA SUBJECTS’ RIGHTS

- 6.1 Data Subjects have the following rights regarding data processing, and the data that is recorded about them:
- 6.1.1 To make subject access requests regarding the nature of information held and to whom it has been disclosed.
 - 6.1.2 To prevent processing likely to cause damage or distress.
 - 6.1.3 To prevent processing for purposes of direct marketing.
 - 6.1.4 To be informed about the mechanics of automated decision-taking process that will significantly affect them.
 - 6.1.5 To not have significant decisions that will affect them taken solely by automated process.
 - 6.1.6 To sue for compensation if they suffer damage by any contravention of the GDPR.
 - 6.1.7 To take action to rectify, block, erase, including the right to be forgotten, or destroy inaccurate data.
 - 6.1.8 To request the supervisory authority to assess whether any provision of the GDPR has been contravened.
 - 6.1.9 To have Personal Data provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
 - 6.1.10 To object to any automated profiling that is occurring without Consent.
 - 6.1.11 To withdraw Consent to processing at any time where Consent is used as the legal basis for processing.
 - 6.1.12 To restrict processing in specific circumstances.
 - 6.1.13 To challenge processing which has been justified on the basis of legitimate interests or in the public interest. The Inagh EIP cannot rely on legitimate interests as a legal basis for processing.
 - 6.1.14 To request a copy of an agreement under which Personal Data is transferred outside of the EEA.
 - 6.1.15 To be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms.
- 6.2 The Inagh EIP ensures that Data Subjects may exercise these rights:
- 6.2.1 Data Subjects may make data access requests as described in Subject Access Request Procedure; this procedure also describes how the Inagh EIP will ensure that its response to the data access request complies with the requirements of the GDPR.
 - 6.2.2 Data Subjects have the right to complain to the Inagh EIP in relation to the processing of their Personal Data, the handling of a request from a Data Subject and appeals from a Data Subject on how complaints have been handled in line with the Complaints Procedure.

7. SECURITY OF DATA AND PERSONAL DATA BREACHES

- 7.1 All Inagh EIP Personnel are responsible for ensuring that any Personal Data that the Inagh EIP holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorised by the Inagh EIP to receive that information and has entered into a data processing agreement.
- 7.2 All Personal Data should be accessible only to those who need to use it. All Personal Data should be treated with the highest security and must be kept:
- in a lockable room with controlled access; and/or
 - in a locked drawer or filing cabinet; and/or
 - if computerised, password protected in line with corporate requirements in the Electronic Communications Policy and/or
 - stored on (removable) computer media which are encrypted in line with Electronic Communications Policy.
- 2.
- 7.3 Care must be taken to ensure that PC screens and terminals are not visible except to authorised Inagh EIP Personnel. All Inagh EIP Personnel are required to enter into an Electronic Communications Policy Agreement before they are given access to organisational information of any sort, which details rules on screen time-outs.
- 7.4 Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises. As soon as manual records are no longer required for day-to-day client support, they must be removed to secure archiving in line with our Data Retention Policy.
- 7.5 Personal Data may only be deleted or disposed of in line with the Data Retention Policy. Manual records that have reached their retention date are to be shredded and disposed of as 'confidential waste' following issue of a certificate of destruction from the Archivist of the Inagh EIP. Hard drives of redundant PCs are to be removed and immediately destroyed as required by the Data Retention Policy.
- 7.6 Processing of Personal Data 'off-site' presents a potentially greater risk of loss, theft or damage to Personal Data. Staff must be specifically authorised to process data off-site.
- 7.7 The GDPR requires Data Controllers to notify any Personal Data Breach to the applicable regulator and, in certain instances, the Data Subject.
- 7.8 The Inagh EIP has put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where the Inagh EIP is legally required to do so.
- 7.9 If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact your Sections Data Protection Nominee (as listed on the Intranet) and/or the DPO, and follow the Data Breach Policy. You should preserve all evidence relating to the potential Personal Data Breach.

8. DISCLOSURE OF DATA

- 8.1 The Inagh EIP must ensure that Personal Data is not disclosed to unauthorised third parties which includes family members, friends, government bodies, and in certain circumstances, relevant law enforcement bodies. All Inagh EIP Personnel should exercise caution when asked to disclose Personal Data held on another individual to a third party. It is important to bear in mind whether or not disclosure of the information is relevant to, and necessary for, the conduct of the Inagh EIP's business.
- 8.2 There are circumstances where it will be required by law to make certain information available to other government bodies or relevant law enforcement bodies which may include Personal Data.
- 8.3 All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the DPO.

9. RETENTION AND DISPOSAL OF DATA

- 9.1 The Inagh EIP shall not keep Personal Data in a form that permits identification of Data Subjects for longer a period than is necessary, in relation to the purpose(s) for which the data was originally collected.
- 9.2 The Inagh EIP may store data for longer periods if the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the Data Subject.

- 9.3 The retention period for each category of Personal Data is set out in the National Retention Policy and, where applicable, in the Inagh EIP's Data Retention Policy along with the criteria used to determine this period including any statutory obligations the DAFM has to retain the data.
- 9.4 The Inagh EIP's data retention and data disposal policies are set out in the Inagh EIP's Data Retention Policy and will apply in all cases.
- 9.5 Personal Data must be disposed of securely in accordance with the sixth principle of the GDPR – processed in an appropriate manner to maintain security, thereby protecting the “rights and freedoms” of Data Subjects. Any disposal of data will be done in accordance with the National Retention Policy.

10. DATA TRANSFERS

- 10.1 All exports of data from within the European Economic Area (EEA) to non-European Economic Area countries (referred to in the GDPR as ‘third countries’) are unlawful unless there is an appropriate “level of protection for the fundamental rights of the Data Subjects”.

The transfer of Personal Data outside of the EEA is prohibited unless one or more of the specified safeguards, or exceptions, apply:

10.1.1 An adequacy decision:

The European Commission can and does assess third countries, a territory and/or specific sectors within third countries to assess whether there is an appropriate level of protection for the rights and freedoms of natural persons. In these instances no authorisation is required.

Countries that are members of the European Economic Area (EEA) but not of the EU are accepted as having met the conditions for an adequacy decision. A list of countries that currently satisfy the adequacy requirements of the Commission are published in the *Official Journal of the European Union*. http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

10.1.2 Privacy Shield:

If the Inagh EIP wishes to transfer Personal Data from the EU to an organisation in the United States it should check that it is signed up with the Privacy Shield framework at the U.S. Department of Commerce. The obligation applying to companies under the Privacy Shield are contained in the “Privacy Principles”. The US DOC is responsible for managing and administering the Privacy Shield and ensuring that companies live up to their commitments. In order to be able to certify, companies must have a privacy policy in line with the Privacy Principles e.g. use, store and further transfer the Personal Data according to a strong set of data protection rules and safeguards. The protection given to the Personal Data applies regardless of whether the Personal Data is related to an EU resident or not. Organisations must renew their “membership” to the Privacy Shield on an annual basis. If they do not, they can no longer receive and use Personal Data from the EU under that framework.

- 10.1.3 Assessment of adequacy by the Data Controller: In making an assessment of adequacy, the exporting controller should take account of the following factors:

- the nature of the information being transferred;
- the country or territory of the origin, and final destination, of the information;
- how the information will be used and for how long;
- the laws and practices of the country of the transferee, including relevant codes of practice and international obligations; and
- the security measures that are to be taken as regards the data in the overseas location.

10.1.4 Model contractual clauses

The Inagh EIP may adopt approved model contractual clauses for the transfer of data outside of the EEA. If the Inagh EIP adopts the *[model contract clauses approved by the relevant supervisory authority]* there is an automatic recognition of adequacy.

10.1.5 Exceptions

In the absence of an adequacy decision, Privacy Shield membership, binding corporate rules and/or model contract clauses, a transfer of Personal Data to a third country or international organisation shall only take place on one of the following conditions:

- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for the establishment, exercise or defence of legal claims; and/or
- the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of giving Consent.

11. INFORMATION ASSET REGISTER/DATA INVENTORY

11.1 The Inagh EIP will maintain a data inventory and data flow process as part of its approach to address risks and opportunities throughout its GDPR compliance project. The Inagh EIP's data inventory and data flow will determine:

- business processes that use Personal Data and source of Personal Data;
- volume of Data Subjects & description of each item of Personal Data and processing activity;
- maintains the inventory of data categories of Personal Data processed;
- documents the purpose(s) for which each category of Personal Data is used;
- recipients, and potential recipients, of the Personal Data;
- the role of the Inagh EIP throughout the data flow and key systems and repositories;
- any data transfers; and all retention and disposal requirements.

11.2 The Inagh EIP assesses risks associated with the processing of particular types of Personal Data.

11.2.1 The Inagh EIP assesses the level of risk to individuals associated with the processing of their Personal Data. DPIAs will be carried out in relation to the processing of Personal Data by the Inagh EIP, and in relation to processing undertaken by other organisations on behalf of the Inagh EIP.

11.2.2 The Inagh EIP shall manage any risks identified by the risk assessment in order to reduce the likelihood of a non-conformance with this Policy.

11.2.3 Where a type of processing, in particular using new technologies and taking into account the nature, scope, context and purposes of the processing is likely to result in a high risk to the rights and freedoms of natural persons, the Inagh EIP shall, prior to the processing, carry out a DPIA of the impact of the envisaged processing operations on the protection of Personal Data. A single DPIA may address a set of similar processing operations that present similar high risks.

11.2.4 Where, as a result of a DPIA it is clear that the Inagh EIP is about to commence processing of Personal Data that could cause damage and/or distress to the Data Subjects, the decision as to whether or not the Inagh EIP may proceed must be escalated for review to the DPO.

11.2.5 The DPO shall, if there are significant concerns, either as to the potential damage or distress, or the quantity of data concerned, escalate the matter to the supervisory authority.

12. DOCUMENT OWNER AND APPROVAL

12.1 The DPO is the owner of this document and is responsible for ensuring that this Policy document is reviewed in line with the review requirements stated above.

12.2 The Inagh EIP reserves the right to change this Policy at any time without notice to Inagh EIP Personnel so please check back regularly to obtain the latest copy of this Policy.

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Management Team & EIP OG	18/10/2021

12.3 A current version of this document is available to all members of staff on the Intranet. This Policy was approved on 18/10/2021 and is issued on a version controlled basis.

12.4 This Policy does not override any applicable national data privacy laws and regulations in countries where INAGH EIP operates.

SCHEDULE 1 - Definitions

“Automated Decision-Making (ADM)” – when a decision is made which is based solely on Automated Processing (including Profiling) which produces legal effects or significantly affects an individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing.

“Automated Processing” – any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing.

“Child”– the GDPR defines a child for the purposes of receiving information services as anyone under the age of 16 years old, although this may be lowered to 13 by Member State law. Where the Data Controller relies on Consent as the legal basis for processing under Article 6(1)(a) of the GDPR, the processing of Personal Data of a child in relation to information society services is only lawful if authorised by the holder of parental responsibility over the child. The Data Controller shall make reasonable efforts to verify in such cases that Consent is given or authorised by the holder of parental responsibility over the child.

“Consent” – agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject’s wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of Personal Data relating to them.

INAGH EIP - “Inagh EIP Personnel” – all employees, workers, directors, and others.

“Data Controller” – the natural or legal person, public authority, agency or other body which, alone, or jointly with others, determines the purposes and means of the Processing of Personal Data where the purposes and means of such Processing are determined by European Union (“EU”) or Member State law, the Data Controller, or the specific criteria for its nomination is provided for by EU or Member State law.

“Data Processor” – the natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller.

“Data Privacy Impact Assessment (DPIA)” – tools and assessments used to identify and reduce risks of a data processing activity. DPIA can be carried out as part of Privacy by Design and should be conducted for all major system or business change programs involving the Processing of Personal Data.

“Data Protection Nominee” - a nominated individual in each section of the Inagh EIP, who will deal with data protection issues. In some cases there may be a “stand-in Data Protection Nominee” if the Data Protection Nominee is on leave.

“Data Protection Officer (DPO)” – the person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the Inagh EIP’s data privacy team with responsibility for data protections compliance.

“Establishment” – the main establishment of the Data Controller in the EU will be the place in which the Data Controller makes the main decisions as to the purpose and means of its data processing activities. The main establishment of a Data Processor in the EU will be its administrative centre. If a controller is based outside the EU, it will have to appoint a representative in the jurisdiction in which the Data Controller operates to act on behalf of the Data Controller and deal with supervisory authorities.

“Explicit Consent” – Consent which requires a very clear and specific statement (that is, not just action).

“Filing System”– any structured set of Personal Data which is accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

“Member State” – any member state of the European Union.

“Personal Data” – any information relating to an identified or identifiable natural person (“**Data Subject**”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Personal Data Breach” – a breach of security leading to the accidental, or unlawful, destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed. There is an obligation on the Data Controller to report Personal Data breaches to the supervisory authority and where the breach is likely to adversely affect the Personal Data or privacy of the Data Subject.

“Policies” or “Related Policies”-This General Data Protection Policy, Inagh EIP policies, operating procedures or processes related to this Policy and designed to protect Personal Data, a list of which is contained at Schedule 2, as may be updated by the Inagh EIP from time to time.

“Privacy by Design” implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR.

“Processing” – any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Profiling” – is any form of Automated Processing of Personal Data intended to evaluate certain personal aspects relating to a natural person, or to analyse or predict that person’s performance at work, economic situation, location, health, personal preferences, reliability, or behaviour. This definition is linked to the right of the Data Subject to object to Profiling and a right to be informed about the existence of Profiling, of measures based on Profiling and the envisaged effects of Profiling on the individual.

“Special Categories of Personal Data” – Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

“Third party” – a natural or legal person, public authority, agency or body other than the Data Subject, Data Controller, Data Processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorised to process Personal Data.

SCHEDULE 2 - Related Policies

1. Inagh EIP - Information Communication and Telecommunication Security Policy
2. Inagh EIP Data Retention Policy
3. Data Breach Policy/Procedure
4. Subject Access Request Policy/Procedure

Appendix No. 8: Inagh EIP – Conflict of Interest Declaration Form OG Members (sample)



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine



The European Agricultural Fund
for Rural Development: Europe
investing in rural areas



Ireland's European Structural and
Investment Funds Programmes
2014-2020
Co-funded by the Irish Government
and the European Union

CONFLICT OF INTEREST DECLARATION FORM

PART 1:		To be completed by all Project Staff and Board Members	
Project Name	Inagh EIP		
Full Name	Dermot Houlihan	Forestry Consultant (Timberland Forestry)	
Position	Member of Inagh EIP OG		
Do you have a (potential) conflict of interest to declare? (Yes or No)			(Yes/No)
If you do not have a (potential) conflict of interest to declare please sign the form where indicated below.			No
If yes, please state if the conflict relates to you personally or to a member of your family or a person connected to your family:			
Please set out below details of the conflict/potential conflict:			
I acknowledge that I am familiar with and understand the requirements set out in Project as they relate to me.			
Signed: Dermot Houlihan		Date: 18 th October 2021	

PART 2:	
All Declaration of Interest Forms must be signed off by Project Manager	
Please set out below the steps taken, if any, to address the (potential) conflict of interest identified by the person named above:	
Signed: <i>Paul Ó Súilleabháin</i>	Date: 18 th October 2021

*In the case of Project Manager, the form should be signed by the OG Chairperson.

Appendix No. 9: Inagh EIP – Expression of Interest (EOI) Form (blank)

Inagh European Innovation Partnership (EIP) Farmer Expression of Interest (EOI) Form GENERAL INFORMATION All sections should be completed.	
Name:	
Address:	
Farm Location (if different from above)	
Herd Number	
Name of local water body (bodies) on farm	
Name of local water body (bodies) on farm	
Approx. length of river frontage on farm (if any)	
Contact Details	Phone No. _____
	Mobile No. _____
	E-mail Address:
Have you been part of REPS or AEOS previously? <i>Please place an X in the appropriate Box</i>	Yes If YES please give details e.g. when joined, timeframe, etc.
	No
Are you currently part of GLAS or any other agri-environment scheme incl. REAP? <i>Please place an X in the appropriate Box</i>	Yes If YES please give details e.g. when joined, timeframe, etc.
	No
Farm Enterprise(s):	
Please give a brief description of ideas you have to improve water quality, biodiversity and land fragmentation on your farm / land holding in the period Sept 2021 to Sept 2022.	
I wish to Express My Interest in being part of the Inagh EIP if selected. If selected, I give my authorisation to the Project Manager to access my herd number BPS /GLAS /TAMS /REAP /Forestry participation details actions or other relevant Department schemes, or their successors, to enable accurate writing of farm plans and avoid issues of double funding.	
Signature: _____	Date: _____

Appendix No. 10: Inagh EIP Farmer Selection Criteria, Selection Principles & Eligibility



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine



The European Agricultural Fund
for Rural Development: Europe
investing in rural areas



Ireland's European Structural and
Investment Funds Programmes
2014-2020

Co-funded by the Irish Government
and the European Union

Inagh EIP (European Innovation Partnership) Selection Principles, Eligibility and Farmer Selection Criteria

1. Introduction:

Participation in the Inagh EIP is entirely voluntary and will be based on an Expression of Interest (EOI) received from farmers / forestry owners wishing to participate in the EIP. Each EOI received will be assessed based on a range of selection principles, eligibility criteria and a selection criteria.

2. Overarching Selection Principles

The following overarching selection principles have been agreed by the Inagh EIP Operational Committee in the planning of the EIP. These overarching selection principles are designed to support policy objectives regarding farming, water quality and biodiversity. They state that selection for inclusion in the Inagh EIP should:

- Support the inherent water quality, biodiversity and environmental value of the measures chosen;
- Support the relative water quality, biodiversity and environmental value of the actual measures;
- Support the complementarity of the overall package of measures in the Inagh EIP with each other;

3. Eligibility Criteria

To be eligible for the Inagh EIP all participating farmers / forestry owners must:

- have a land holding on a water body in the Upper Inagh Catchment;
- be actively farming this holding in the Upper Inagh Catchment;
- be 18 years or over on the 1st September 2021 (the expected date of entry of the first tranche);
- have a herd number and be an active herdowner / forestry owner, i.e. he / she is submitting a valid annual application under the Basic Payment Scheme, including a declaration of all lands farmed;

A participating farmer must undertake to adhere to the conditions as set out and as outlined in their contract and the Terms and Conditions of the EIP. They must accept that failure to meet the requirements may result in the forfeiture of all or part of the payment, and exclusion / expulsion from the Inagh EIP.

4. Farmer Selection Criteria

Eligible farmer applicants into the Inagh EIP will be scored and ranked by the Inagh EIP Operational Committee /Project Manager to determine entry order, according to following key selection criteria:

- Area of land included in water bodies in the Upper Inagh Catchment
- Current water quality status (Q Value at Subcatchment level) on water body on land holding
- Area of land with river frontage and with other natural water bodies (if any);
- Proportion of designated land (Inagh Catchment) as a % on their holding;

Farms in the Upper Inagh Catchment that have little or no designated land but whose land does contain water bodies and / or important drainage channels flowing into the Upper Inagh River will also be considered for inclusion in the first entry tranche (starting September 2021) and any subsequent entry tranches (if any). A scoring system will be devised based on the above selection criteria.

Appendix No. 11: Inagh EIP Farm & Forestry Measures

11.1 Inagh EIP Suite of Measures (For On Farm Water Quality, Biodiversity, & Habitat Enhancement Work)



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine



The European Agricultural Fund
for Rural Development: Europe
investing in rural areas



Ireland's European Structural and
Investment Funds Programmes
2014-2020

Co-funded by the Irish Government
and the European Union

Inagh EIP – Suite of Measure

Description of Project Activities: A suite of practical biodiversity actions which have been co-designed and co-developed to address biodiversity loss and habitat fragmented on 14 farms / areas of forestry and within the wider community. The suite of forestry and farm measures include measures to enhance local biodiversity and improve water quality (instream and riparian biodiversity) in conjunction with local landowners and external parties.

Suite of Measures & Project Activities – 01/09/2021–31/03/2023

Continue engagement with local farmers / forestry owners and recruit between 10 and 14 'pilot' farmers / forestry owners based on Expression of Interest (EOI) format
Review, assess and sign up the local 'pilot' farmers / forestry owners
Undertake baseline biodiversity assessment on the designated sites
Undertake school and community biodiversity outreach programme / local citizen science programme
Suite of Measures: +
Deliver on-farm biodiversity measures, forestry biodiversity measures, natural flood mitigation measures and community biodiversity measures (focused on community space and Cloontabonniv bog). The suite of measures co-designed and co-developed with the local farming community in the planning of the Inagh EIP include: <ul style="list-style-type: none">➤ Establish pond networks, and create pocket wetlands and inceptor ponds.➤ Widen buffer zones where site hydrology and the slope increases the vulnerability of receiving waters leading to further biodiversity loss.➤ Build bunds (separating forestry areas and water course) and comprehensive brush mats in advance or during the initial stages of clear-felling operations in known sensitive sites.➤ Setback planting of single trees or small groups of suitable native riparian species of trees and shrubs, strategically placed for bank stabilisation and dappled shading and to provide a food source for aquatic life.➤ Encourage thinning of crops to let light in, which is good for local biodiversity and adds value to the crop.➤ Examine options for continuous cover forestry, with increased diversity of tree species and age.➤ Clear conifers planted close to water courses; replace with broadleaf species at irregular spacing and in clumps.➤ Review setback areas / riparian zones and plant, where possible, buffer zones (with broadleaf trees); manage these zones purely for biodiversity gain and water protection purposes.➤ Retrofit Sitka buffer zones with additional broadleaf species (where possible / practical).

- Plan for future clear-felling operations in the operational area (especially in noted vulnerable areas in the Upper Inagh River) to retain a strip of trees or small areas (of the existing tree species – namely Sitka spruce) for a number of years until a replacement crop has become established.
- Proactively maintain silt traps in advance of tree-felling operations.
- Train and capacity building for contractors and machine operators in standard operating procedures (SOP) and best practice, with a training module aimed at foresters and forest owners.
- ‘Woodlands for Water’ measures (combining native woodland and water setback, including permanent undisturbed water setback, 10–25 metres in width (or wider, if required).
- Establish areas uncrossed by new drains and largely unplanted and create new native woodland areas.
- Block, where possible, existing drains (with silt traps, slow-flow dams) to break existing pathways from source to the receiving watercourse and settlement areas.
- Review option to undertake otter survey work (catchment wide – Upper Inagh Catchment) and installation of artificial otter holts (×1) or an additional artificial otter holt if additional suitable sites are identified.

Monitor the implementation of measures and their success and assess against key performance indicators (KPIs)

Officially launch the Inagh EIP and related project website and social media sites

Deliver End of Project Report and End of Project Workshop

Present Project Outcomes – to include the development of suite of policy recommendations and a local action plan for an expanded Locally Led Project focused on the work of the Inagh EIP

Appendix No. 11:**Inagh EIP Farm & Forestry Measures****Appendix No. 11.2:****Inagh EIP Suite of Measures (Additional Biodiversity Measures and Provisional Indicative Payment Rate for Water Quality, Biodiversity, and Habitat Enhancement Work)**

An Roinn Talmhaíochta,
Bia agus Mara
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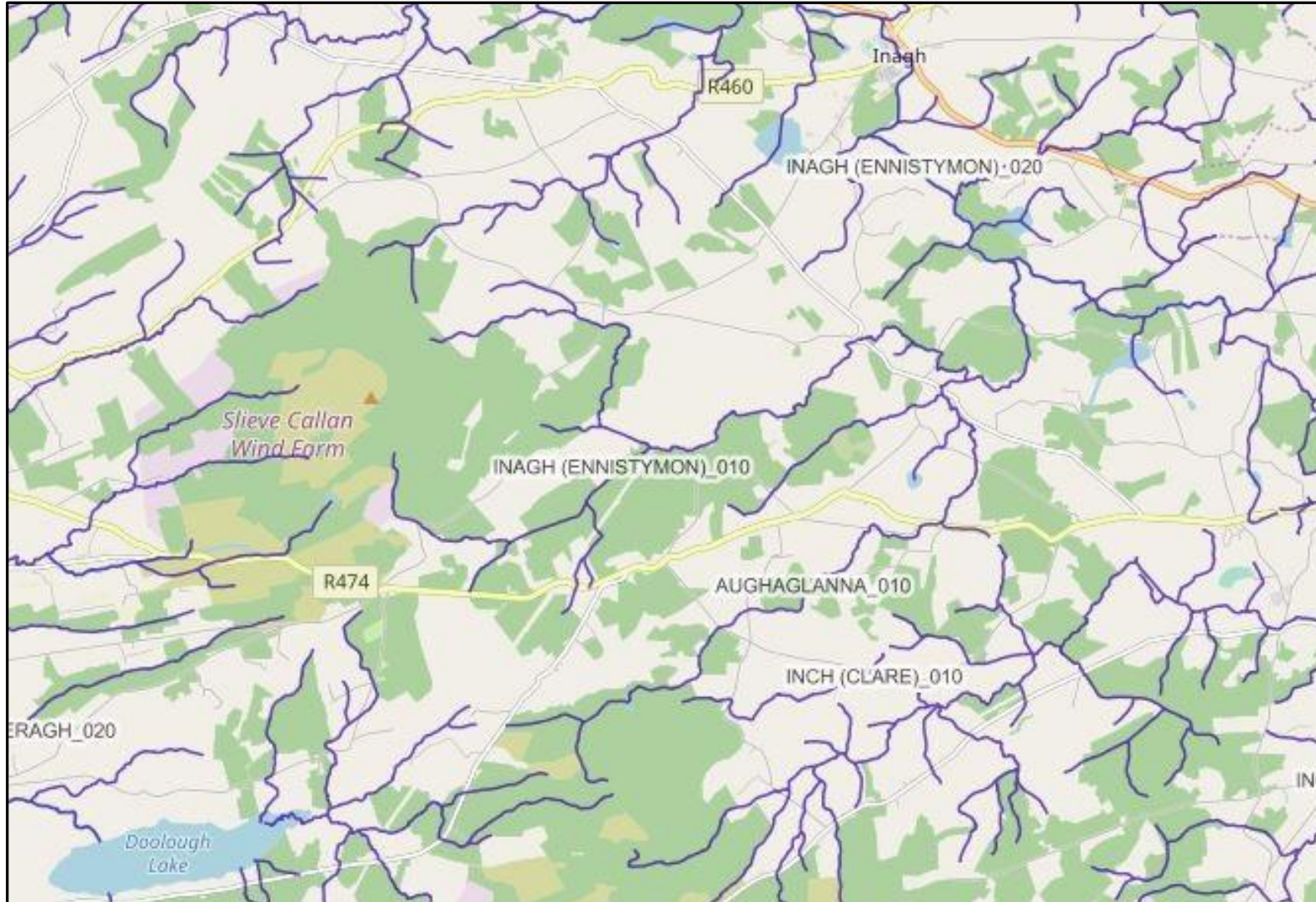
Ireland's European Structural and
Investment Funds Programmes
2014-2020

Co-funded by the Irish Government
and the European Union

Additional Biodiversity Measures and Provisional Indicative Payment Rate

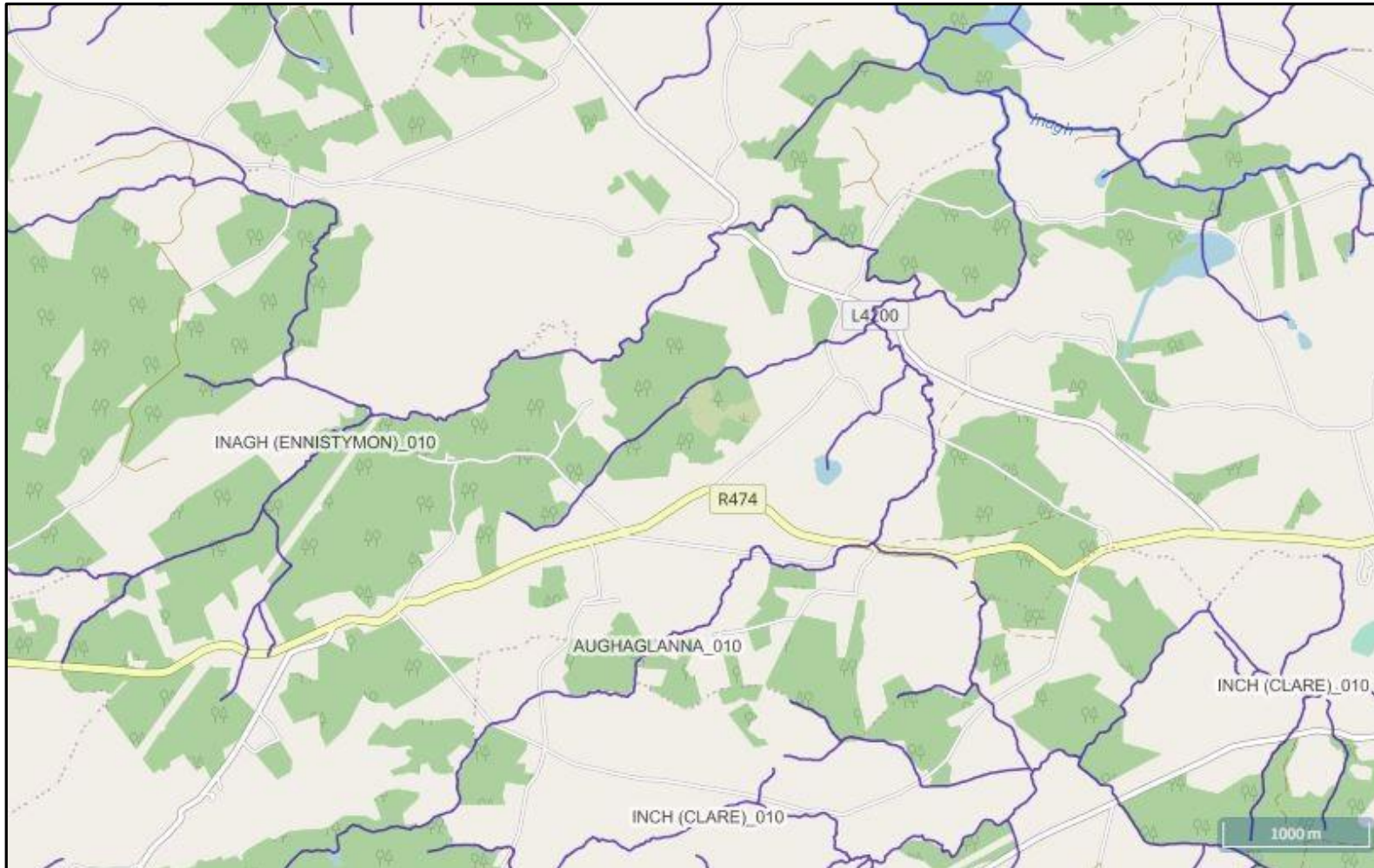
Inagh EIP 2021-2022	Measure	Suggested Payment
1	Biodiversity Plot	250
2	Bee Scrape/sand	100
3	Bog Retention	TBC
4	Exposed Rock Management	TBC
5	Bat Boxes	70 (2 boxes)
6	Dipper Bird Boxes / Nesting Platforms	250 max (species dependent)
7	Rodenticide Alternative	60
8	Field Margin increase	max 500
9	Water pump for animals	250 per unit
10	Hedgerows (new)	150 per 100m
11	Invasive Species Control	100
12	Multispecies Swards	max 500
13	Nettle Patch	50
14	Ponds	TBC
15	Reedbed	TBC
16	Riparian Buffer Strip	max 500
17	Scrub/Wasteland Retention/removal	TBC
18	Species Rich Grassland	TBC
19	Treelines (new)	max 500
20	Woodlands (new)	500
21	Silt Traps	TBC
22	Pollinator Plot	100
23	farm risk assessment & training session	150
24	Culvert removal and build up	TBC
25	Farmer suggested measure	TBC

Overview of the Upper Inagh Catchment & Nearby Catchments



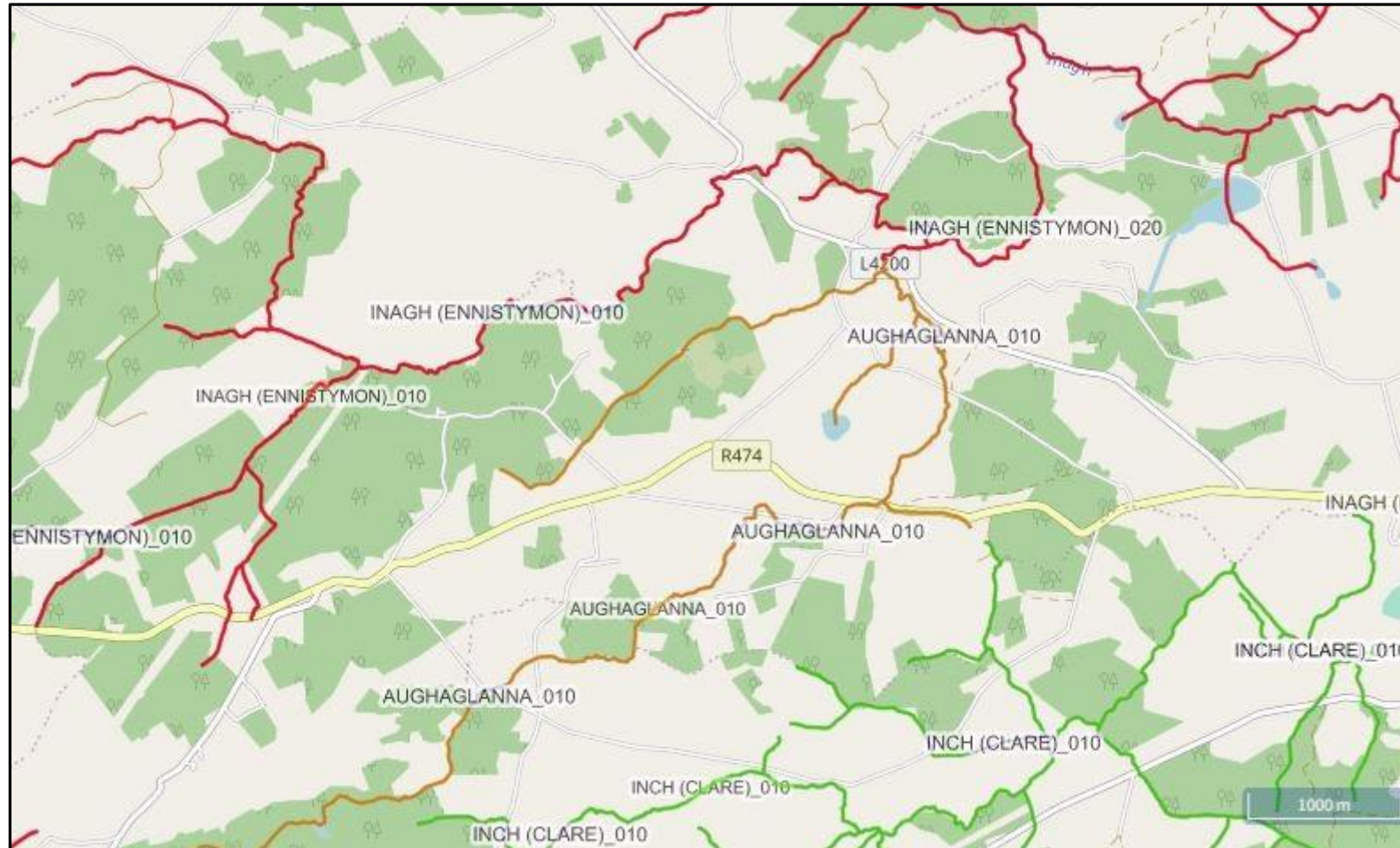
Map No. 12.1 – Overview of the Upper Inagh Catchment & Nearby Catchments (Source: EPA – www.catchments.ie)

Overview of the Upper Inagh



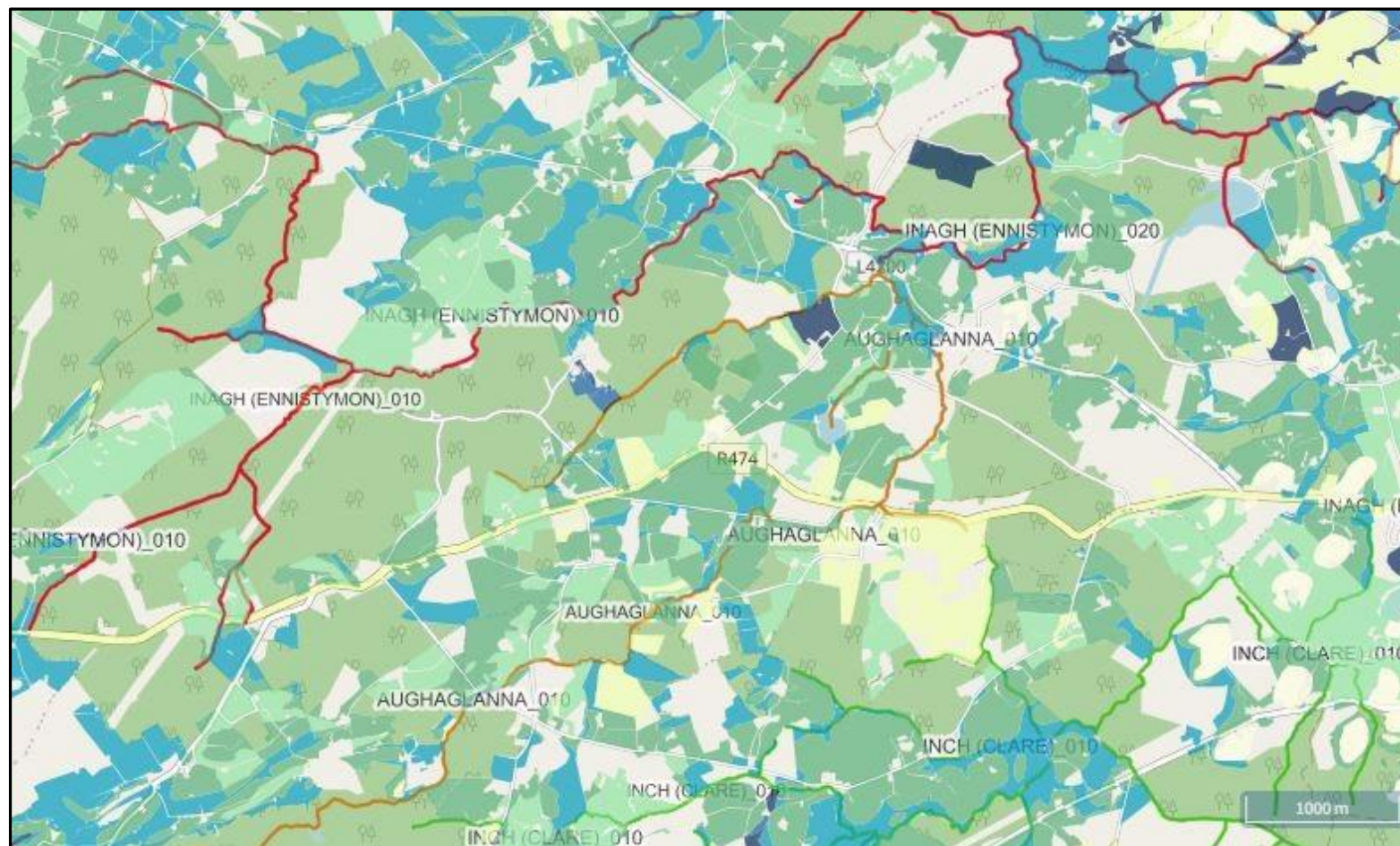
Map No. 12.2 – Overview of the Upper Inagh Catchment (Source: EPA – www.catchments.ie)

Overview of the Upper Inagh Current Water Quality Status



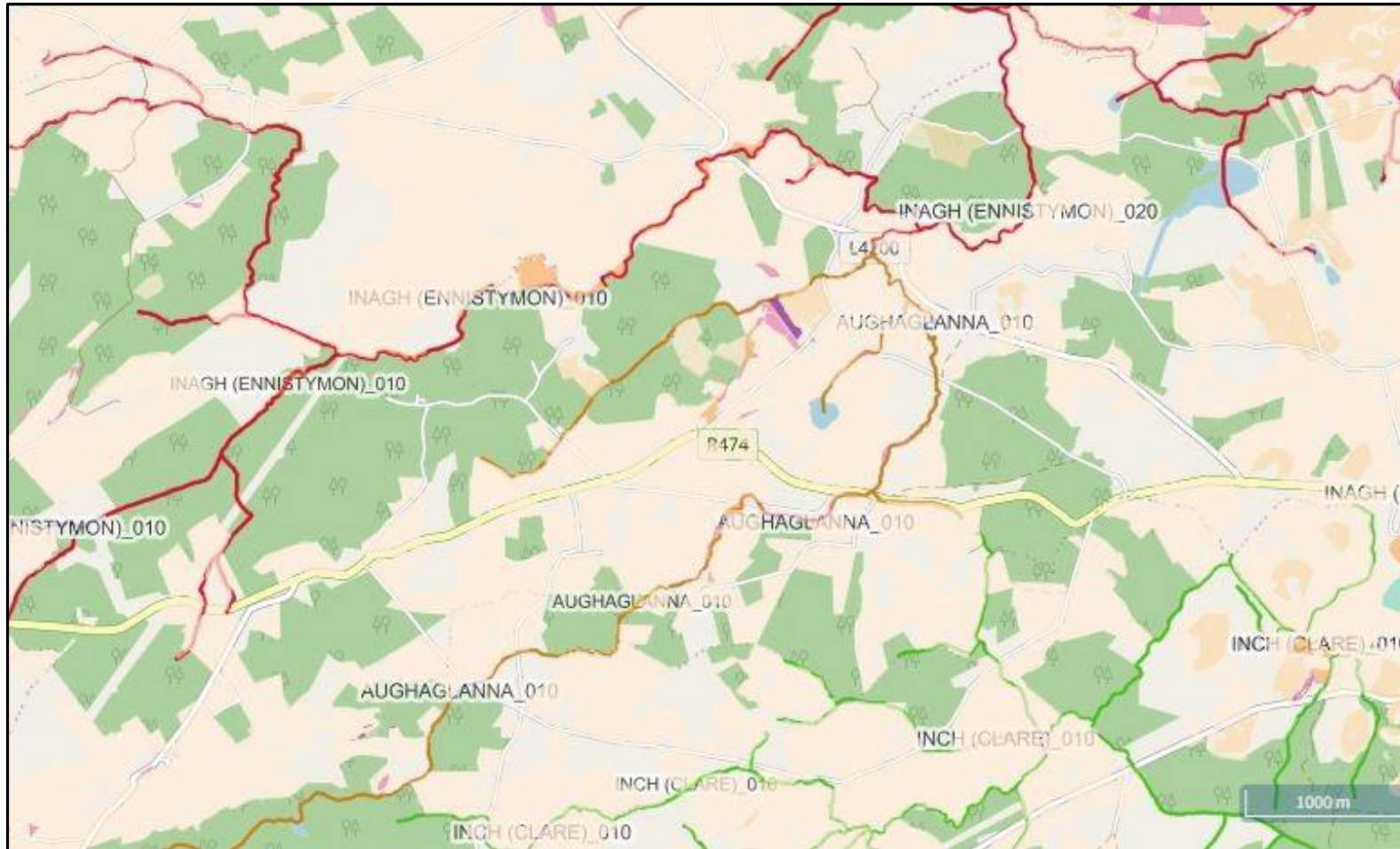
Map No. 12.3 – Overview of the Upper Inagh Catchment – Current Water Quality Status (2018-2021) (Source: EPA – www.catchments.ie)

Upper Inagh River Catchment Pollution Impact Potential – Phosphorus



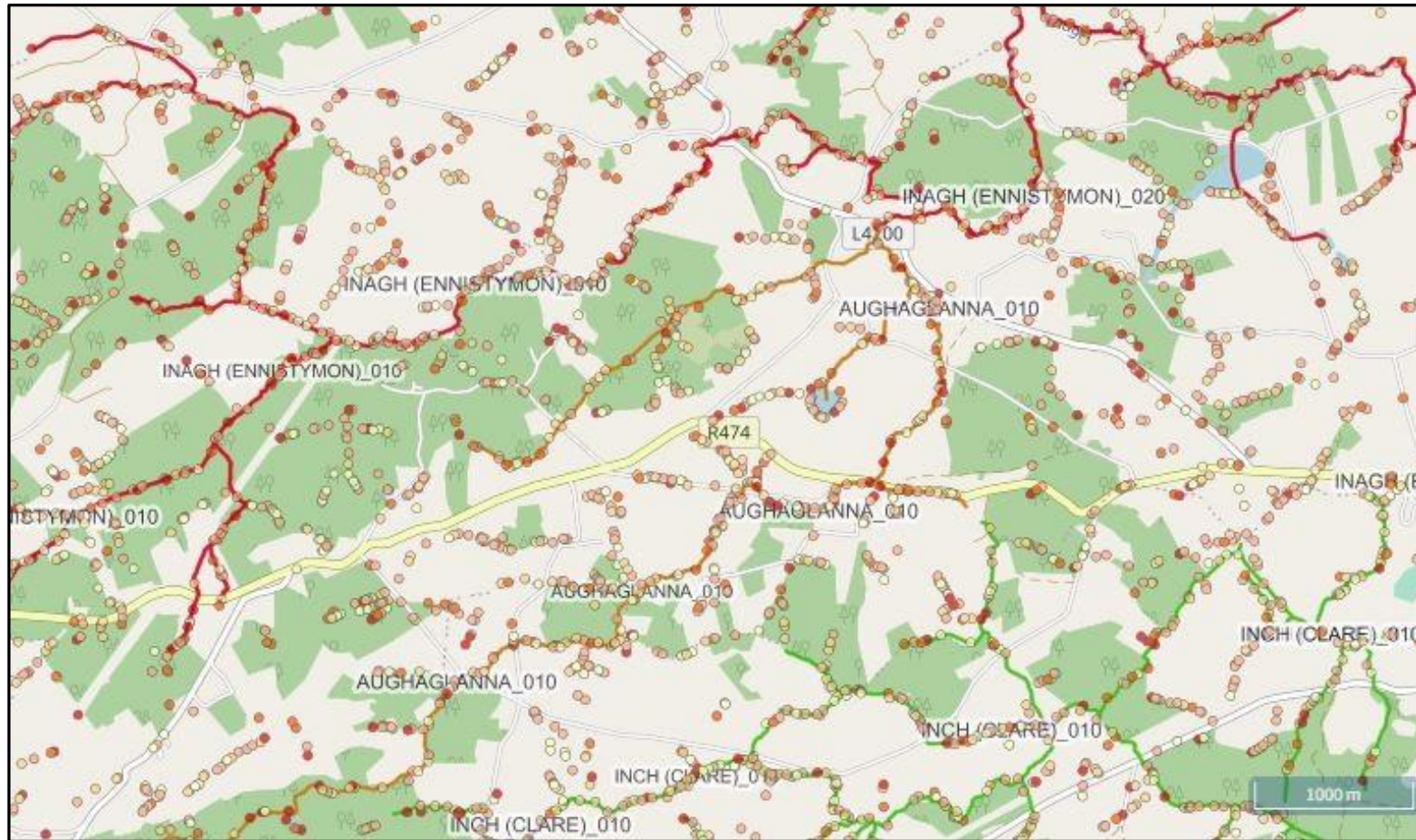
Map No. 12.4 –Upper Inagh River Catchment – Pollution Impact Potential (PIP) Map – Phosphorus (Source: EPA – www.catchments.ie)

Upper Inagh River Catchment Pollution Impact Potential – Nitrate



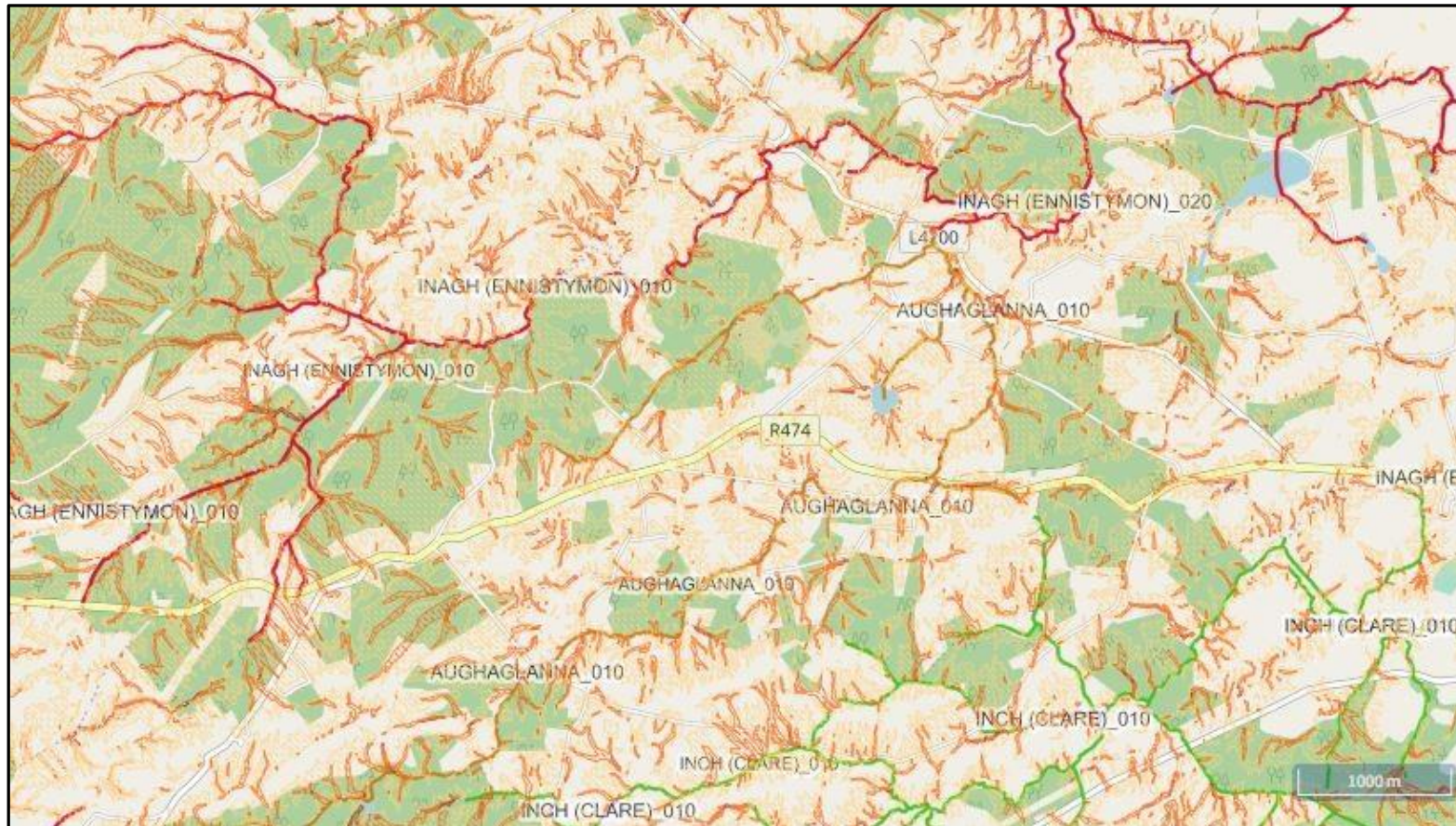
Map No. 12.5 –Upper Inagh River Catchment – Pollution Impact Potential (PIP) Map – Nitrates (Source: EPA – www.catchments.ie)

Upper Inagh River Catchment PIP- Phosphorus - Flow Delivery Points



Map No. 12.6 –Upper Inagh River Catchment – Pollution Impact Potential (PIP) Map – Phosphorus Flow Delivery Points (Source: EPA – www.catchments.ie)

Upper Inagh River Catchment PIP- Nitrate - Flow Delivery Points



Map No. 12.7 –Upper Inagh River Catchment – Pollution Impact Potential (PIP) Map – Nitrate Flow Delivery Points (Source: EPA – www.catchments.ie)

