



ICHAS

Section 9 – Information and Data Management

Subject:	Privacy Policy Statement		
Applicable Standard	QQI	Core	Information and Data Management
<i>Date Approved by Academic Council:</i>			June 2021
Policy Version	1/2021	Date due for Revision	February 2024

Privacy Policy Statement

As a student, past student or prospective student of ICHAS, some of your personal data will be processed by us. The Institute is the data controller and all personal data that it holds and processes is subject to data protection legislation.

The data held by the Institute is collected from a range of sources including the CAO, previous education providers and directly from yourself during the application and registration process. During the course of your studies, additional data is created by, about and featuring you, e.g. assessment results, assignment uploads, lecture broadcasts and recordings.

The Institute may share information between different internal departments for operational reasons as is necessary and proportionate for the purposes intended.

The types of information we collect about you includes:

- Student ID number
- Name, date of birth, country of birth, nationality and telephone numbers
- Address
- PPS number
- Email address
- Next of kin/emergency contact details
- Details of previous examination results
- Schools/colleges attended
- Course application details
- Image in digital photography for ID card
- Image in live and recorded lectures

- Voice in live and recorded lectures
- Financial information (including details of funding and fees paid and outstanding)
- Bank details, including IBAN, BIC, name of bank/building society (where applicable)
- Grants and fees information
- Academic history, results and awards
- Attendance records
- Engagement with the LMS and use of facilities such as the library
- Gender
- Garda Vetting Declaration
- CV (if provided by you)
- Image in CCTV footage/photography/filming
- Exam scripts, projects and other assessment materials
- IP address

For certain programmes which involve contact with minors, information about past criminal convictions is processed. In addition to the normal standards of confidentiality, we also carefully control access to sensitive data within the Institute so that it is only available to people who 'need to know'.

How we use your information:

ICHAS holds your personal data in order to implement and manage services and processes relating to your admission, registration, teaching & learning, examinations, graduation and other services such as student support services. Without this information, ICHAS would not be able to provide its services. ICHAS only obtains and processes information required for these purposes.

Under data protection law, we are required to ensure that there is an appropriate basis for the processing of your personal data, and we are required to let you know what that basis is. The primary legal bases that we use are:

- processing that is necessary for the performance of our contract with you;
- processing that is required under applicable law;
- processing that is necessary in the public interest;
- processing where we have your consent.

Where the processing of your personal data is based on you providing consent, you may have the right to withdraw consent at any time by contacting the department or service who obtained that consent, or the Institute's Data Protection Office (contact details below).

The purposes for which ICHAS may process your personal information include:

- To administer your academic programme, record academic achievements and determine/record your overall award outcome

- To support you in your studies i.e. we may use information you have given us (e.g. disability) and information we collect about your engagement with services (e.g. ICHAS LMS) to identify students who require additional support or specific services and enable analytics for reporting purposes (such as student progress and academic performance)
- To monitor and evaluate the student experience
- To administer your student financial requirements (e.g. payment of fees)
- To identify you and enable you to access resources by means of your ICHAS ID card. This may include the production of class lists with student images for use within the Institute.
- To enable effective communication between you and ICHAS
- To manage facilities and services including computing, library, counselling liaison, etc.
- To administer academic conduct, student discipline, appeals, complaints, grievances, and other similar matters.
- To ensure your health, safety and well-being
- To provide information to organisations such as the HEA, QQI and other Government Departments and Agencies in line with legal and government requirements
- To comply with statutory reporting requirements
- To produce reports and aggregated statistics for management and research purposes in order to plan and improve services
- To administer voluntary surveys of student opinion about your experience and the performance of the Institute
- To create and publish, print and electronic material (e.g. prospectus, brochures, website, etc.) for promotional and press materials, documentation and archival purposes
- To maintain a proportionate CCTV system for the specific purposes outlined in the CCTV Policy
- Recording of audio\images during lectures as part of the Institute's teaching provision
- Retention of recording of audio\images for up to 18 months as part of the Institute's teaching provision
- To assist with law enforcement or where required or authorised by law
- To confirm the details of your academic achievements and for statistical and historical purposes, a core record of your studies is retained indefinitely
- To enable our continued contact with you after you complete your studies (e.g. survey of graduate work destinations, alumni networks, marketing, etc.)
- To respond to requests for information made under Data Protection legislation or Freedom of Information legislation.

Does ICHAS share your data with any third parties?

Below are some examples of when the Institute may release data about you to third parties (i.e. outside ICHAS) where we have a legitimate reason in connection with your studies.

- Data Processors (sub-contractors used by ICHAS in order to carry out a function for the Institute, e.g. cloud-services providers, MIS developers)
- Higher Education Authority (HEA)* - please refer to the HEA collection notice below
- Quality and Qualifications Ireland (QQI)
- Department of Social Protection to verify employment status and eligibility for allowances
- Revenue Commissioner
- Professional & regulatory bodies where programmes are accredited by such bodies
- Work placement\Internship providers
- Other higher education institutions, partners or research organisations to which a student transfers or pursues an exchange programme or where a student's programme is being run collaboratively
- Software providers or service providers performing administrative functions on behalf of ICHAS (e.g. IT services, academic gowning services)
- External examiners
- Photographers, videographers and media personnel to facilitate the marketing, promotion and documentation of activities in ICHAS such as graduation
- Plagiarism detection service providers (e.g. VeriCite, TurnItIn) to ensure academic standards
- Potential employers/recruitment companies for verification of qualifications
- Irish Survey of Student Engagement (ISSE)
- Insurance companies in respect of accidents occurring within ICHAS
- Institute legal advisors
- An Garda Síochána to assist in the prevention or detection of crime
- Auditors

Publication

All graduating students, including those graduating in absentia, will have their name and their award listed in the graduation booklet. Student achievements may be celebrated on our website, social media and in institute publications.

Parents, guardians and other relatives

It is your responsibility as a student to communicate and engage with ICHAS. ICHAS will not normally disclose your data to parents or relatives without your consent, other than in exceptional circumstances i.e. where there is potential danger to the health or well-being of a student. We may agree to discuss matters relating to you with a parent/relative but only if you

consent to this. Exceptionally, where urgent communication with a student through direct contact details is not possible or has, following repeated attempts, been unsuccessful, contact may be via a student's parents\guardian and/or next of kin using contact details provided by the student.

Individual Rights

You have the following rights, subject to certain exemptions, in relation to your data:

- The right to be informed about data processing (see above)
- The right to request access to a copy of the personal data that we hold about you (please see Policy and Procedure associated with Data Subject Access Request)
- The right to rectification i.e. to have inaccurate or incomplete personal data corrected
- The right to erasure of personal data where there is no legitimate reason for ICHAS to continue to process your personal data. If you exercise this right, ICHAS will continue to hold some personal data which, for graduates, will include name, subject(s) studied, graduation details, date of birth and unique identification number, so that we do not inadvertently contact you in the future and to maintain your education records for archive purposes. We may also continue to hold some financial records about you for statutory purposes. Finally, we may hold recordings that contain your image/audio as part of recorded lectures for up to 18 months as outlined above.
- The right to data portability - you have the right to request that the Institute provides some elements of your information (e.g. academic progress records) in order to provide it to other organisations.
- The right to object – you can object to the processing of your personal data by ICHAS in certain circumstances, including the sending & receipt of direct marketing material.

In order to exercise any of the above rights please contact us using the contact details set out below.

Data Retention

The Institute will retain your personal data in accordance with our retention policy in our data inventories. The policy operates on the principle that we keep personal data for no longer than is necessary for the purpose for which we collected it. It is also kept in accordance with any legal requirements that are imposed on us. This means that the retention period for your personal data varies depending on the type of personal data.

The Institute will hold some of your data indefinitely in support of your lifelong relationship with ICHAS or unless you ask us to do otherwise. See 'The right to erasure of personal data' above.

Security:

ICHAS uses every appropriate physical and technical security measure to prevent unauthorised access, alteration or destruction of data. These measures are reviewed regularly.

Questions & Complaints

If you are unhappy with the Institute's handling of your personal data, or believe that the requirements of the Data Protection Act or GDPR may not be fully complied with, you should contact the Institute's Data Protection Officer in the first instance. You also have the right to submit a complaint to the Data Protection Commissioner.

How to Contact Us:

Please contact us if you have any questions about the information we hold about you or to request a copy of that information:

- By email: marie.mulcahy@ichas.ie
- In writing: Data Controller, Irish College of Humanities and Applied Sciences, Walton House, Lonsdale Road, National Technology Park, Casteltroy, Limerick