

Hibernia College Quality Framework

Policy for Data and Records



1 Introduction

1.1 Purpose

This policy sets out the principles and responsibilities of Hibernia College in relation to the collection, storage, processing, and retention of data.

1.2 Scope

a. To whom does the policy apply?

- i. This is an overarching policy that applies to all staff, faculty, adjunct faculty, and third parties involved in the use of data by the College.

b. In what situations does the policy apply?

- i. This policy relates to the use of data that falls under the EU's General Data Protection Regulation (GDPR)¹.

c. Who is responsible for implementing the policy?

- i. The Records and Data Manager is responsible for managing the College's implementation of policy for data and records and for managing and addressing breaches of this policy.
- ii. The Director of IT is responsible for operational matters regarding the technical security and safety of data.
- iii. All staff, faculty, adjunct faculty, and students are responsible for ensuring that this policy is adhered to.
- iv. Where third parties are involved in collaboration with the College for any reason, they are also required to adhere to this policy.

1.3 Definitions

a. GDPR definitions

As this policy relates to the use of data, primarily under the GDPR, Hibernia College adopts the definitions outlined in *Article 4* of the GDPR as appropriate.

¹ European Union (2016) *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN> [Accessed 05/10/2018]; Data Protection Act (2018) Dublin: Stationery Office. Available at: <http://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/print.html> [Accessed 05/10/2018].

2 Context

2.1 Legal or Regulatory Context

a. *GDPR*

This policy is intended to facilitate the College in fulfilling its obligations under GDPR.

b. *Irish Data Protection Law*

This policy is also intended to ensure the College's compliance with Irish legislation in relation to data protection².

c. *QA guidelines*

The policy is designed with regard to both the European standards and guidelines³ and QQI's Core Statutory QA Guidelines⁴, which both specify requirements in respect of the collection, processing, storage, and disposal of data.

2.2 International Effective Practice

Hibernia College is cognisant of the requirement to use and store data and records safely and securely. In this respect, the College follows international effective practice for the electronic storage of data and records.

3 Policy Statements

3.1 Principles for Data

a. *Collection and processing of data*

- i. We only collect and process data for purposes that are:
 - Lawful
 - Fair
 - Relevant to the provision of Hibernia College programmes
 - Necessary for the fulfilment of other legal or accreditation obligations.
- ii. We endeavour to ensure that data is kept accurate, relevant and not excessive.
- iii. Each record or piece of data has a specified owner.

b. *Disclosure*

- i. Data will only be disclosed to the data subject or to persons authorised to process the data in accordance with the principles for collection and processing of data.

c. *Storage*

- i. We store data and records in a format that is suitable for the processing of the data.

² Data Protection Act 2018; Data Protection Act 2018.

³ European Association for Quality Assurance in Higher Education (ENQA) et al. (2015), *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2nd edn, p. 32 Section 1.7). Available at: http://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf [Accessed 28/08/2018].

⁴ Quality and Qualifications Ireland (2016) *Core Statutory Quality Assurance (QA) Guidelines*, Section 8. Available at: <https://www.qqi.ie/Downloads/Core%20Statutory%20Quality%20Assurance%20Guidelines.pdf> [Accessed 05/10/2018].

- ii. We ensure that data and records are stored in a safe and secure manner.

d. Retention

- i. Data and records are retained for a period that is the length of time that they are useful or required to be kept by a third party or by law.
- ii. Where a member of staff or faculty believes that a record should be retained for a longer period than that set down in this policy, they must consult with the Records and Data Manager to ensure reasonable justification for retaining the data exists.
- iii. Data and records are only to be retained if they have a legal, fiscal, administrative or historical purpose.
- iv. Each record retained is original and unique.
- v. We maintain a retention schedule which specifies the duration and means of disposal for particular types of data.

e. Disposal

- i. Records whose retention periods have expired are destroyed promptly and securely.
- ii. The disposal or destruction of data or a record is recorded.

f. Support

- i. The College provides support, assistance, advice and training to all departments, offices and staff to ensure it is in a position to comply with this policy.

4 Document Control

Document Title	Policy for Data and Records		
Author	QA Project Officer		
Version	V.1	Adoption Date	28/06/2018
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Related Policies	Policy for Public Information, Promotion and the Recruitment of Students		
Related Procedures	Procedure for Managing Personal Data Security Breaches		
Related Resources	Document Retention Schedule HCQF		