
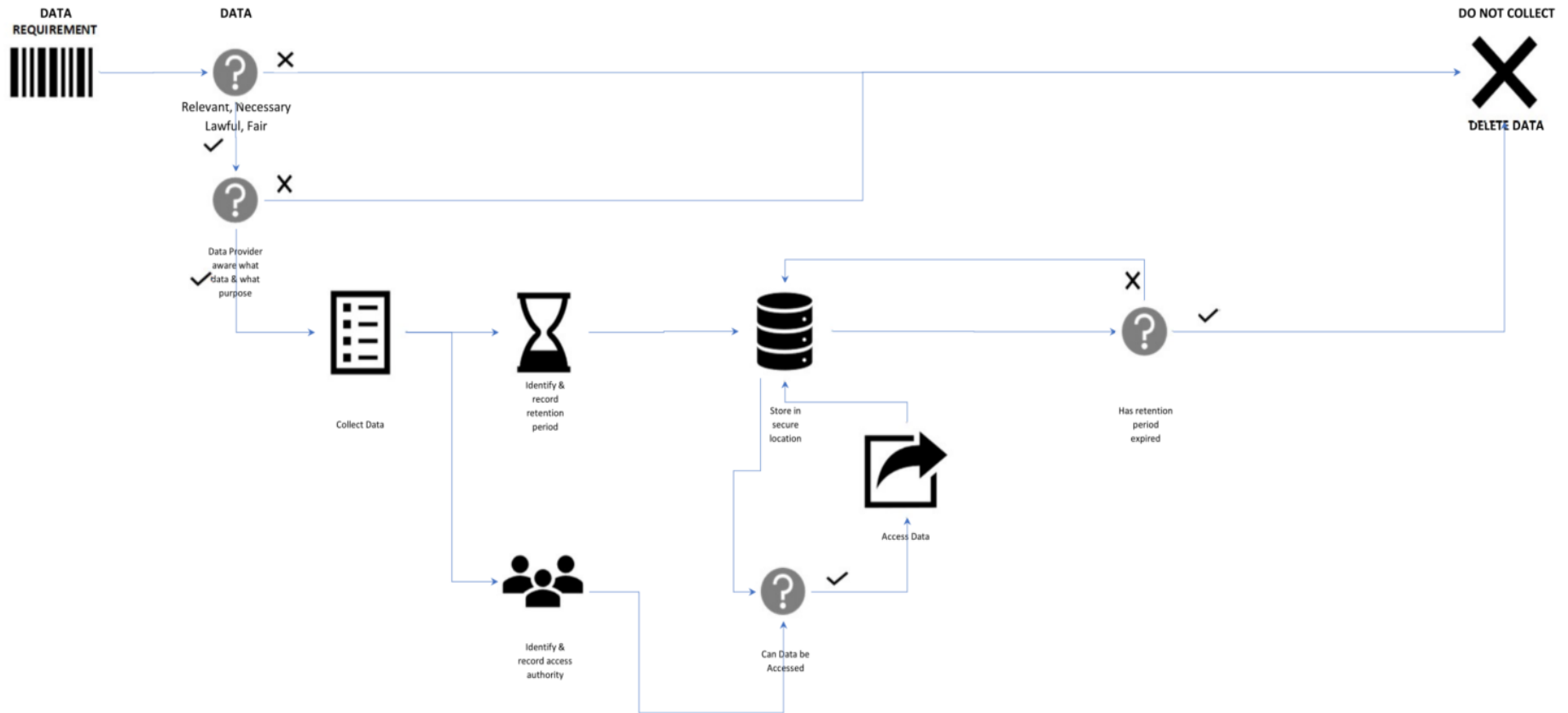


#	POLICY TITLE	POLICY AREA:	VERSION:	DATE ADOPTED :
	<b>8.3 STORING, RETENTION AND DISPOSAL OF DATA</b>	8) INFORMATION AND DATA MANAGEMENT	3.0	August 2020



## **Introduction and Context:**

### **Purpose**

This policy (In conjunction with BQA 8.1: Principles, Terms and Conditions of use of the College's Information and Communication Technology and BQA 8.2: Privacy Policy) sets out the principles, procedures and responsibilities of SNMCI in relation to the storage, processing and retention of data.

### **Scope**

This policy applies to all staff, faculty (full and part-time) and any third parties including placement settings involved in the use of data by the College.

This policy applies to the use of data in any situation that falls under the EU's General Data Protection Regulations (GDPR)<sup>1</sup>.

The Head of Examinations and Registrations is nominated as the GDPR Officer and is responsible for implementing the policy for information and data management and for addressing breaches of this policy.

The I.T. Manager is responsible for the technical security and safety of data.

All data users are responsible for adhering to this policy in their own practice.

### **Legal and Regulatory Context**

This policy is designed with regard to the College being able to fulfil its obligations under GDPR and with regard to compliance with Irish legislation<sup>2</sup> with respect to data protection.

The policy is also designed with regard for QQI Core Statutory Quality Assurance Guidelines<sup>3</sup> which describe the need for a Provider to have policies and procedures in place with respect to the collection, processing, storage and disposal of data.

## **Policy Statement:**

### **Collection and Processing of Data**

<sup>1</sup> 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>

<sup>2</sup> Data Protection Act (2018) Dublin: Stationery Office. Available at: <http://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/print.html>

<sup>3</sup> Quality and Qualifications Ireland(2016), Core Statutory Quality Assurance (QA) Guidelines, Section9. Available at:

<https://www.qqi.ie/Downloads/Core%20Statutory%20Quality%20Assurance%20Guidelines.pdf>

- We only collect and process data for purposes which are:
- Relevant to the provision of SNCMI programmes and/or for the protection of learners of all ages
- Necessary for the fulfilment of accreditation and legal obligations
- Lawful and fair
- Clearly explained to the data provider before the data is collected
- We seek to ensure that data is accurate, relevant and in proportion to the data usage purpose.

#### **Data Storage**

- Data is stored securely, either in digital or concrete formats.
- Data is stored so that it is easily accessed by those with appropriate authority and in a format which is suitable for processing.
- Each piece of data is original and unique.
- Each record includes an approved retention period and an approved data access authority record.

#### **Retention of Data**

- Data is retained no longer than is necessary to fulfil the purpose for which the data was originally collected or for the period that it is required to be retained by law or accreditation agency, whichever is the longer.

#### **Disclosure of Data**

- Data will only be disclosed to the persons or organisations as identified in the data access authority record. Data will not be disclosed other than in accordance with this policy statement.
- Where it is necessary for a third party, including e.g. Quality and Qualifications Ireland (QQI); the Higher Education Authority (HEA); the Department of Education and Skills (DES); the Psychological Society of Ireland (PSI); the Teaching Council of Ireland (TCI); any other Professional, Regulatory or Statutory Body.
- Where we need to comply with a legal or regulatory obligation e.g Garda National Immigration Bureau (GNIB).

#### **Disposal of Data**

- Data will be deleted as soon as the retention period has expired.

#### **Staff Involved:**

Data Information Officer; CEO; DQAA; IT Manager; All staff

	<b>Person/s Responsible</b>	<b>Records generated to ensure evidence of follow through</b>
<p><b>Procedure Outline</b></p> <ul style="list-style-type: none"> <li>- Where a need to collect data is identified, data will only be collected in accordance with statement above.</li> <li>- Data may be collected and processed in hard or soft copy format or both.</li> <li>- Each data record will have an associated retention period record.</li> <li>- Data is stored in a secure and accessible format.</li> <li>- Electronic data is stored on the College’s data information systems which is secured by a variety of encryption and password protection mechanisms depending on the level of data security required.</li> <li>- Hard copy data is stored by Senior Management in a secure environment.</li> <li>- Financial data is stored by the College’s accountant and all hard copy data is stored in locked cabinets.</li> <li>- Where data needs to be accessed either for processing or disclosure, it can only be accessed by users with appropriate and identified access privileges.</li> <li>-</li> <li>- Access control is determined either electronically by the I.T. Manager or by the holder of hard copy records, which is usually the academic management team.</li> <li>- When the retention period has expired the data records are deleted, in the case of</li> </ul>	<p>Admissions Data Information Officer</p> <p>GDPR Officer</p> <p>I.T. Manager</p> <p>CEO/DQAA/LSO</p> <p>Accounts Office</p> <p>As appropriate</p> <p>CEO/IT Manager/Academic Management</p> <p>GDPR Officer in</p>	<p>Data records, retention records, access records</p> <p>Electronic and hard copy data records FQA8.3A: Data Retention Schedule</p>

electronic data, or destroyed by secure shredding, in the case of hard copy data	conjunction with appropriate source	
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### Policy Control Sheet

<b>Policy</b>	<b>QA 8.3: Storing, Retention and Disposal of Data</b>
<b>Version</b>	3.0
<b>Adopted/Effective</b>	August 2020
<b>Supersedes</b>	2.0
<b>Monitoring/ Next Review Date</b>	Yearly/August 2021
<b>Responsible Officer(s) Designated Reviewer(s)</b>	Data Information Officer; Admissions; CEO; DQAA; Programme Management
<b>Scope</b>	College wide

### References

<b>SNMCI Policy area</b>	<b>8) Public Information and Communication: QA Vol 3</b>
<b>Developed with reference to</b>	European Union (2016) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. Data Protection Act (2018) Dublin: Stationery Office. Quality and Qualifications Ireland (2016), Core Statutory Quality Assurance (QA) Guidelines,
<b>Related SNMCI Policies / Forms</b>	QA 8.1: Principles, Terms and Conditions of use of the College's Communication and Information Technology QA 8.2: Privacy Policy FQA 8.3 A: Document Retention Schedule

### Revision

<b>Revision Number</b>	<b>Revision Description</b>	<b>Originator</b>	<b>Approved By</b>
2.0/August 2020	General Review for Blended Status	Office of DQAA	

