



# **Dundalk Institute of Technology**

## **Privacy Notice – Student Data**

**Set out in line with General Data Protection  
Regulation (GDPR)**

# FOREWORD

Under current Data Protection legislation Data Protection Acts 1998 and 2003 privacy notices should be on any collection point where personal data is being collected from a data subject especially if being collected for a new purpose. New data protection legislation is coming into force on 25<sup>th</sup> May 2018 which builds on current expectations around privacy notices but expands on the requirements based on the widened first principle which now specifically requires controllers to be transparent with their data processing.

This privacy notice explains how Dundalk IT collects, uses and shared your personal data and your rights in relation to the personal data that we hold on you. This privacy notice concerns our processing of personal data of past, current and prospective students of the Institute.

The Institute is the data controller of all personal data it holds and must process it subject to the Data Protection Acts noted above and the new General Data Protection Regulation (GDPR) coming into force on 25<sup>th</sup> May 2018.

## Types of Information Collected

Dundalk Institute of Technology will be the Data Controller for any information held on you. The Institute may obtain, hold and process the personal data of students including: personal details, family and social circumstances, education and training records, employment information, financial details, details of services provided to you. It may also obtain, hold and process sensitive personal data and special category data of students including racial or ethnic origin and physical and mental health.

The types of personal data that may be collected is as follows:

- Name, contact information (address, email address, telephone numbers) date of birth, PPS number, passport number, nationality and country of domicile, next of kin, photo.
- Information relating to your education and training records.
- Information relating to your family and social circumstances.
- Sensitive personal data which is classed as special category data to include physical or mental health, racial or ethnic origin.
- Certain criminal activities. Students who will be undertaking a work placement and/or activities as part of their programme of study are obliged to be vetted should that activity bring them into contact or possible contact with children and/or vulnerable adults. The National Vetting Bureau (Children and Vulnerable Persons)

Acts 2012 to 2016 provide the statutory basis for such mandatory vetting to take place. DkIT offer programmes that require students to undertake such mandatory placements with external agencies which will bring them into contact with children and/or vulnerable person and in which they will assume positions of public trust. DkIT is therefore committed to adhering to such legislation and will ensure that only suitable candidates are allowed to undertake these programmes. Apart from the formal listed programmes, any student who participate in or are in the vicinity of any activities that may involved unsupervised access to children / vulnerable persons will also be subject to the Institute's Vetting process.

## **Purpose of Collecting this Information**

All the personal data the Institute collects, holds and processes on students including sensitive/special category data is done so in order to be able to implement and manage all services and processes relating to students including student recruitment, admission, registration, teaching and learning, examination, graduation and other vital support services such as student support, careers, work placements, health and welfare. The Institute will only collect and process data that is required for these purposes. The Institute may not be able to provide these relevant services and offer a quality service without the processing of such data. This information is passed between different sections of the Institute for operational reasons as is necessary however the information shared is proportionate for the intended purpose.

Information collected can be used for the following purposes:

- Recruitment of students
- Admission and Registration of students
- Academic matters – teaching and learning provision, assessment, examinations, attendance, graduation, grievance and disciplinary matters.
- Provision of student cards for identification / security purposes.
- Provision of IT services
- Provision of Library services
- Provision of student services such as Access Office, Disability Office, Learning Support, Careers Office, Counselling Service, Health Centre, Clubs and Societies, Accommodation.
- Administering finance related issues such as fees, financial supports scholarships, prizes and bursaries.
- Research and statistical analysis
- Safety and wellbeing of all students
- Monitor and evaluate the student experience to enhance services further

- Enable effective communication with our students.
- To provide data to organisations such as the HEA (Higher Education Authority) in line with legal and government requirements.
- To comply with statutory reporting requirements.
- To administer voluntary surveys of student opinion about your experience and the performance of the Institute.
- To create and publish printed and soft copy material such as prospectus, brochures, website for promotional and archive purposes.
- To assist with law enforcement or where required as 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 on the student information system, Banner.
- To enable the Institute to continue to contact you after you graduate for example to complete surveys of graduate work destinations, alumni news, marketing etc.
- To respond to requests for information made under data protection legislation.
- To assist sporting/society bodies who may require student data such as date of birth or confirmation of being in full time education as a pre-requisite to student representing the Institute in formal events or competitions.

## **How we Collect your Information**

The personal data the Institute holds and processes relating to students is obtained directly from the student or applicant or in some cases from a third party involved in the education services provided by the Institute that has obtained the original information in the first place for example the CAO for student recruitment/admission or SOLAS in the case of Apprentice education provision.

Personal data may be collected in a number of ways including:

- The information you supply to us when you express an interest in becoming a student (application process via forms either hard copy or soft copy or registration processes).
- Directly from the CAO (Central Applications Office) which processes applications for undergraduate courses in the Irish Higher Education Institutions.
- Directly from SOLAS which manages the National Apprentice training system.

# **Basis for Processing Information**

## **What We Do With Your Information**

The processing of personal data is necessary to allow us to perform our duties as part of our contract to provide services to you or to allow us to follow up on expressions of interest and enquiries. All the personal data we process is processed by our staff in Dundalk IT however for the purposes of IT operations the hosting and maintenance of student data is held on a student information system – Banner. The server holding this data is monitored by our IT Services team and also services and maintenance provided by an external provider working in conjunction with the Institute. We have a strict regime in place to oversee the effective and secure processing of your personal data and you can gain more information on this IT framework by accessing the Institute website section on IT Policies and Procedures.

Dundalk IT may disclose students personal data and sensitive personal data to external agencies only where it has obligations or a legitimate reason to do so including the following:

- Higher Education Authority (HEA) – Collection and sharing notice below refers.
- Department of Social Protection for PPS verification
- Irish Survey of Student Engagement
- Quality and Qualifications Ireland (QQI) for qualification validation
- Student Universal Support Ireland (SUSI) for grant eligibility purposes
- Revenue Commissioners
- Professional and regulatory bodies where programmes are accredited by such bodies eg ACCA, Institute Engineers Ireland, An Bord Altranais etc.
- Work placement providers
- Employers where students are studying in an Apprenticeship
- Other higher education organisations, partners, or research organisations to which a student might transfer or undertake an exchange programme or where a programme of study or research is being collaborated.
- Software and service providers performing administrative duties on behalf of DkIT such as IT services provision, clinical tools, management of car park and so on.
- Students Union in DkIT to facilitate the running of student electoral process.
- External Examiners who review sample exam papers and answers as part of quality check.
- Printing companies and agencies who facilitate the printing and delivery of mailshots and Institute publications for marketing purposes.
- Sponsors who fund student prizes, awards and bursaries.

- TurnItIn plagiarism detection software providers to ensure academic standards adhered to.
- Potential employers and recruitment agencies who wish to verify qualifications of students as part of their recruitment process.
- Insurance companies in regard to accidents occurring on Institute property
- Legal advisors to the Institute.
- An Garda Síochána to assist in the prevention or detection of criminal activity.
- DkIT Sports /AURA to assist them in the provision of their services to students. (Photos are also shared as a means to aid identification).
- Internal Auditing companies and Office of Comptroller and Auditor General.

This is not an exhaustive list and any other disclosures to third parties that may occur but are not listed here are made only where there is a legitimate reason to do so and in accordance with the law.

## **What are your rights as an Individual?**

Students/individuals whose personal data including sensitive data is held by DkIT have the following rights regarding their own data:

- The right to be informed
- The right to request access to their personal data held by DkIT
- The right to rectification – to have any inaccurate or incomplete personal data rectified.
- The right to erasure of personal data. This will only arise where there is no legitimate reason for the Institute to continue to process the personal data. If you exercise your right to erasure DkIT will retain a set of core personal data which for alumni will include, name, programme of study and subjects studied, graduation details, date of birth and student ID number so that we do not contact you inadvertently in future and to maintain your education details for archive purposes. It may be necessary to also retain some financial records about you for reporting and audit purposes.
- The right to restrict processing of personal data. Individuals have the right to block the processing of their personal data by the Institute in specific situations.
- The right to data portability. Students have the right to request the provision of some elements of their information in digital form in order to provide it to other organisations (for example their academic progression data).
- The right to object. You can object to the processing of your personal data by DkIT in certain circumstances including the sending and receipt of direct marketing material.

- The right to object to automated decision making and profiling. You have the right to object to decision taken by automatic methods without a human intervention in some circumstances.

Where the processing of personal data or sensitive personal data is based on the consent of the student, they have the right to withdraw that consent at any time. To do this the student should contact the department or service who obtained their consent originally.

As a student, if you are unhappy with the Institute's handling of your personal data or believe that the requirements of the data protection legislation are not being complied with you should contact the Institute's Data Protection Office in the first instance. Additionally the Institute's formal complaint procedure can be invoked if appropriate and you also can submit a complaint to the Office of the Data Protection Commissioner. Please see DkIT Data Protection webpage for further details.

You also have rights of access to the data the HEA holds about you. This information can be obtained by an individual presenting with a photographic identification to the HEA.

## **Data Retention**

Dundalk Institute of Technology will hold your data indefinitely to assist with your lifelong relationship with the Institute or until you ask us to do otherwise. All records retained by the Institute are held in accordance with the Institute's Records Management Schedule (available on website).

If you exercise our right to erasure, we will retain a set of core personal data which for graduate will include: name, subjects studied, graduation details, date of birth, and your unique identification number so that we can assist you with any queries you may have in the future, to maintain your education details for reference and archive purposes but also to ensure that we do not contact you inadvertently in the future.

The Institute may also need to retain some financial records about you for statutory purposes.

We respect your right to request us to cease contact by any or all methods of communication or for any specific purpose.

# Collection and Sharing Data with HEA

DkIT will send some of the information we hold about you to the HEA (Higher Education Authority). This data forms your HEA student record, and allows them to perform their statutory functions under the Higher Education Authority Act 1971. As part of these functions they share your student record with the following Departments:

- Department of Education and Skills
- Department of Enterprise Trade and Innovation
- Department of Social Protection
- Central Statistics Office

Who use your HEA student record to perform their statutory functions connected with education in the Republic of Ireland. Your HEA record will not otherwise be used in any way that affects you personally.

The data sent to the HEA will come from the following:

- Your student record data based on information collected from you at Registration.
- Data from the voluntary Equal Access Survey.
- Shortly after you graduate the Institute may contact you to request you to complete the HEA Graduate Outcomes Survey. This is voluntary and we will not give your phone or email contact details used for this survey to the HEA.
- During your time in DkIT you will be invited to participate in the Irish National Survey of Student Engagement. Some of your information may be sent to the HEA to ensure that the survey is offered only to relevant target groups. Your information may be matched to your survey responses in order to allow for anonymous analysis or results. For example your gender or if you are in full time or part time studies. Your responses will be treated confidentially and no individual student will be identifiable in any reports or results generated as a result of this survey.

## **What does the HEA further do with your data in more detail?**

The HEA uses the data for fact based statistical analysis to help understand the needs that higher education should meet, to promote equality of opportunity in higher education and to assist the government in developing future higher education policies and investment. The HEA does this by linking the information from the Student record, the Equal Access Survey and Graduate Outcomes Survey through student ID number and or PPSN for more accurate statistical analysis to help improve education services and policies.



### **HEA Publications:**

The HEA use the HEA student record to produce anonymised aggregate data in annual statistical publications. These include some National Statistics publications and online management information services.

### **Who the HEA shares your data with:**

The HEA shares records with other official bodies such as those listed above for the following purposes:

### **Student Grant Application Verification**

The HEA will provide your student record to CDET (SUSI) an agent of the Department of Education and Skills. This record will include data on any previous enrolment in higher education in the Republic of Ireland. The HEA record is provided for the purposes of verification of data supplied by students as part of grant applications, verifying that a student is enrolled or registered in accordance with the rules of an approved institution, assisting in the processing of applications for grants and determining an applicants eligibility for grant support under the education progression requirements of the Student Grant Scheme and the Student Support Act 2011.

### **Statutory Statistical Functions:**

#### **Central Statistics Office**

The CSO may also use the information contained in your student record to carry out their statutory functions of measuring population levels and monitoring public expenditure.

#### **Research, equal opportunity, journalism, other legitimate interest/public function**

- Student data is provided to the Department of Education and Skills to allow them carry out research and analysis using this data within the Department for example to look at the transition rate analysis and third level demand projections.
- Student data such as PPSN, name, address, date of birth may be sent to the Department of Social Protection Client Identify Services to verify PPSN.
- HEA administrative graduate data is linked via your PPSN to Revenue administrative employment data in the Central Statistics Office to analyse graduate outcomes in relation to sector and salary etc.
- Anonymised aggregate non personal data to third parties:

The HEA will supply anonymised aggregate data to third parties for the purposes of equal opportunities monitoring, Freedom of Information, research and journalism in the public interest. This data on its own will not identify any individual.

**Equal Opportunities Monitoring** – the HEA student record may contain details of ethnic group and disability. This data is only used where it is needed to promote or maintain equality of opportunity or treatment between persons of different racial or ethnic origins or different states of physical or mental conditions.

**Research** – This may be academic research, commercial research or other statistical research into education where this is of benefit to the public interest.

**Journalism** – where the relevant publication would be in the public interest.

**Anonymised aggregate data for the above purposes is supplied by the HEA to the following types of user:**

- Local, regional and national government bodies who have an interest in higher education
- Higher education sector bodies
- Higher education institutions
- Academic researchers and students
- Commercial organisations (recruitment firms or graduate employers for example)
- Unions
- Non-government organisations and charities
- Journalists

Individuals cannot be identified from anonymised aggregate data.