



## Data Retention Policy

### Version 1.2

Purpose:	The purpose of this policy is to ensure that the Institute applies retention periods appropriately and retains data only for the period for which it is allowed under these new retention periods.
Circulation:	This document is available for all to review and will be published on the Institute's website.
Policy author:	Data Protection Office
Policy Owner:	Vice President for Finance & Corporate Affairs
Approval Date:	TBA
Date to Review:	In accordance with legislation

## Document Location

Data Protection Office.

## Revision History

Date of drafting: June 2023	Date of next review: June 2026
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Version Number/Revision Number	Revision Date	Summary of Changes
1.0	November 2023	Original Draft
1.1	12 January 2024	<ul style="list-style-type: none"><li>• Insertion of new Section 4.2 – Electronic Records</li><li>• Insertion of new Section 4.6 - Litigation Holds</li><li>• Supporting Legislation updated</li></ul>

## Consultation History

Version Number/Revision Number	Consultation Date	Names of Parties in Consultation	Summary of Changes
V1.0	November 2020	FAR Committee	<p><b><i>M.F.205.7 DkIT Policies extract from FAR Minutes</i></b></p> <p><i>Draft Records Management Policy &amp; Draft Date Retention Policy</i></p> <p><i>The policies were approved subject to the Records Management policy being amended as per the request from the VPSCD in regards to retention of documents for externally funded projects. The VPSCD to confirm the requirements to Freedom of Information Officer, Data Protection Office.</i></p> <p><i>Proposed by: Clifford Kelly</i></p> <p><i>Seconded by: Sadie Ward McDermott</i></p>
	February 2021	Governing Body	<p>Data Retention Policy to include a line on page 15 of 36 under Research and before HR</p> <p>Externally and Self-Funded Projects As set down by the funder Administration of Programmes</p>
	26 January 2024	Staff Unions	Discussed and agreed with Staff Unions



## Approval

This document requires the following approvals:

<b>Name</b>	<b>Title</b>	<b>Date</b>
FAR Ref 205.7	Finance Audit Risk Committee of Governing Body	8 <sup>th</sup> December 2020
GB Ref 281.5	Governing Body	23 <sup>rd</sup> February 2021
EB	Executive Board	25.11.2025

**The Governing Body agreed the original Policy on Tuesday 23 February 2021 It shall be reviewed and, as necessary, amended by the Institute annually. All amendments shall be recorded on the revision history section above.**

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## 1. OVERVIEW

The Institute is responsible for the processing of a significant volume of information across each of its Schools and Functions. It is vital that everyone is aware of their responsibilities in relation to data protection and Freedom of Information as follows:

- It is the responsibility of each School and Function to ensure this information is processed in a manner compliant with the relevant data protection legislation and guidance.
- The Institute has an appointed Data Protection Officer ('DPO') who is available to Schools and Functions to provide guidance and advice pertaining to this requirement.
- All Staff and other persons charged with maintaining information on behalf of the Institute must appropriately protect and handle information in accordance with the information's classification system and in line with best practice as dictated by Freedom of Information legislation - effective maintenance of organizational records to ensure efficient search and retrieval of records as required.
- Confidential Information requires the greatest protection level (e.g. personal data).

This Policy shall not be interpreted or construed as giving any individual rights greater than those, which such person would be entitled to under applicable law and other binding agreements.

## 2. PURPOSE

The purpose of this policy is to ensure that the Institute applies retention periods appropriately and retains data only for the period for which it is allowed under these new retention periods. It sets out the procedures that should be in place and puts responsibility on each School and Function to ensure that the Institute remains compliant with this area of the regulation. This policy should be read in tandem with the Institute's Records Management Policy.

## 3. SCOPE

This policy applies to:

- Any person who is employed by Dundalk Institute of Technology who receives, handles or processes data in the course of their employment.
- Any student of Dundalk Institute of Technology who receives, handles, or processes data in the course of their studies for administrative, research or any other purpose.
- Third party companies (data processors) that receive, handle, or process data on behalf of Dundalk Institute of Technology.

## 4. POLICY

This policy should not be viewed in isolation. Rather, it should be considered as part of the Dundalk Institute of Technology suite of Data Protection policies and procedures (see Appendix B for full list).

Institute policy is to retain and dispose of information in compliance with legal and regulatory requirements together with this Data Retention Policy and related policies.

In particular:

- Data Protection legislation only applies to a living individual's personal information, e.g. student or staff information (potential, current or past). Commercial requirements may drive disposal of other information, not covered by Data Protection legislation.
- Data Protection legislation is not the only body of legislation, which prescribes minimum retention periods for certain, types of information. Other legislation or regulations should also be considered when defining minimum retention requirements (e.g. legislation requiring retention of employee records or financial information). Schools and Functions must confirm which retention requirement defines appropriate retention periods.
- From a Data Protection legislation point of view, this document only deals with those parts, which relate to information retention, disposal and retrieval.

#### **4.1 Information Retention and Disposal (see as reference: Records Management Policy / Record Keeping Guidelines)**

Schools and Functions must define appropriate Management Processes to comply with information management policy, legal and regulatory requirements, international standards, and best practices.

These processes must be:

- Based on the information owner's approval of these information use processes.
- Sufficiently flexible to address the range of bases on which personal data may be processed.
- Cognisant of other departments' dependence on any retained or disposed information.
- Use appropriate security requirements based on School and Function information classification levels.
- Include appropriate retention mechanisms facilitating reasonable retrieval times to support Institute business, regulatory or disposal requirements.
- Use and maintain appropriate and durable information retention/retrieval mechanisms to prevent damage, degradation or unauthorised alteration and ensure retrieval at any time.

Schools, Functions and Information Owners must develop, maintain, procure and manage information retention and disposal procedures, mechanisms, facilities and services to ensure that they are effective.

Each School/Function and Information Owner must manage the information, including assessment, storage, retrieval and disposal in accordance with this policy and related policies in order to ensure that the information is retained for the appropriate period, in a manner, which befits its sensitivity and value to the Institute.

Schools and Functions shall also ensure that all retained information, within their area of responsibility is:

- Identified, recorded, and assessed to ensure that it is appropriately managed throughout the retention and disposal life cycle.
- Subject to appropriate information management procedures throughout the retention and disposal life cycle.
- Subject to periodic procedure effectiveness reviews.

Schools and Functions must also:

- Communicate all changes to relevant parties.
- Ensure that all students, staff, vendors, independent contractors, consultants and other DkIT IT resource users, charged with managing retained information, are familiar with and trained on all relevant procedures / aware of their responsibilities.
- Take steps to prevent information being destroyed in accordance with the minimum retention periods if it becomes apparent that these steps are necessary in the particular circumstances (e.g. provide timely notification to students, staff, vendors, independent contractors, consultants or entities that use DkIT IT resources, when information is required to be retrieved to support investigations or litigation)
- Retrospectively assess existing information, stored prior to this policy implementation to ensure appropriate documentation, management and disposal.
- Report any inability to comply with this policy via the regular Risk Management processes for their School or Function.

Each School and Function must complete their Retention Schedule, documenting all information categories required for retention within its responsibility (See Appendix A for Data Retention Schedule template). In particular

- Establish appropriate retention requirements for each category.
- Review and update this inventory regularly or post significant change introduction.

Schools and Functions must refer all retention period ambiguities to the DPO and/or Legal Services prior to information disposal. When deciding upon an acceptable retention period, the decision should be grounded on an appropriate legal basis where appropriate. **Schools and Functions should not hold data for longer than is necessary.**

Schools and Functions must contractually ensure that all Contractors and external service providers manage information retention services in such a manner as to

- Minimise risk to the Institute, its employees and its (potential, past, or current) students.
- Ensure that contractors or external service providers allow reasonable audits and inspections access.
- Include, as a minimum, provisions for non-compliance with defined policies and standards, malicious or negligent activities by their employees or agents, and termination of agreement.
- Ensure that Institute information and related records, on which the Institute is reliant, are available and appropriately protected until the period of reliance has elapsed.

Schools and Functions personnel must report non-compliance instances to the:

- Manager responsible for a School/Function and
- Institute DPO

#### 4.2 Electronic Records

- In the case of electronic records where the Institute IT Services maintains the computer equipment, the School and Functional area, which creates/maintains these records, must formally agree backup and recovery procedures with IT Services (as provided for in the Institute Information Security Policy 2019. This is to ensure that there is no ambiguity as to

which office is responsible for records in the event of hardware failure or accidental deletion of records.

- The Head of the academic/functional area concerned must maintain, where electronic records are kept on systems not maintained by IT Services, a formal inventory of such records.
- Staff are reminded that electronic records should be classified in accordance with the Institute's Data Governance Policy and should be handled (stored, transferred, accessed) in accordance with the Institute's Data Protection Policy. Staff should ensure that they are familiar with these policies and other applicable IT Services policies and procedures, as this Retention Policy is to be read in conjunction with same.

#### 4.3 IT Role and Responsibilities

IT shall:

- Review and provide policy input and relevant related documentation, e.g. IT, policies, standards and guidelines.
- Ensure that the technical aspects of the information retention and disposal requirements, as defined by the Information Owner are met, including monitoring of the service provided.
- Support the Information Owner or their representative with those aspects of the Data Retention Schedule, which relate to electronic information.
- Ensure that all copies made of information, within the scope of this policy, whether for development or test purposes, or for internal or external use, are subject to, as a minimum, the same controls as the original information.
- Manage Institute information, in compliance with this policy and other related standards.
- Monitor the supporting processes to ensure ongoing compliance.
- Notify the Information Owner or his/her nominated representative of any non-compliance discovered.
- Ensure that staff or agents acting on their behalf are fully familiar with and trained on all of the relevant policies and procedures and that they are aware of their responsibilities.
- Provide supporting evidence of compliance on request to the Information Owner and DPO.
- Allow appropriate access to the Information Owner or their appointed representatives.

#### 4.4 DPO Roles and Responsibilities

The DPO shall

- Establish and maintain effective policies, standards and guidelines relevant to information retention and disposal.

- Distribute relevant documents to Schools and Functions including policy or related standards/guidelines updates.
- Periodically review all relevant policies and related standards/guidelines for effectiveness.
- Provide relevant advice and support to Schools and Functions to assist them in achieving and retaining policy/standards compliance.
- Monitor policy and standards compliance and ensure that School and Function plans provide for this compliance.
- Approve any compliance exceptions.
- Assist any breaches in data protection that occur in conjunction with the relevant School/Function personnel.

#### 4.5 Legal Services Roles and Responsibilities

Based on request for the Institute, the Institute appointed Solicitor shall if required:

- Review and provide policy input and related documentation, e.g. standards and guidelines.
- Provide information retention and disposal legal advice to DPO, Schools and Functions.
- Assist Schools and Functions with contract drafting relating to external service providers providing information retention and disposal services.

#### 4.6 Litigation Holds

##### *What is a Litigation Hold?*

The Institute requires all Institute Personnel to fully comply with the general guidance set out in this Retention Policy and the specific retention periods set out in each unit specific Data Retention Schedule.

All Institute Personnel should note the following general exception to any stated destruction schedule: if the President's Office and/or the HR Department informs you, that certain Data held by the Institute is relevant to current litigation, potential litigation (that is, a dispute that could result in litigation), government investigation, audit or other event, the School/Functional area must preserve and not delete, dispose, destroy or change such data, including e-mails, until the Institute President and/or the HR Department determines that such data is no longer needed.

This exception is referred to as a "*Litigation Hold*", and takes priority over any previously or subsequently established destruction schedule for those records. If any Institute Personnel believe this exception may apply, or have any questions regarding whether it may possibly apply, please contact the President's Office and/or the HR Department.

*What to do when notified of a Litigation Hold.*

The destruction of data must stop immediately upon notification from the Institute President's Office and/or the HR Department that a litigation hold is to begin due to ongoing or potential litigation or an official investigation. Destruction may begin again once the President's Office and/or the HR Department, as appropriate, has confirmed that the relevant litigation hold has been lifted

## **5. POLICY COMPLIANCE**

### **5.1 Compliance**

Breaches of this policy may result in infringement of Freedom of Information legislation, data breaches under data protection legislation, reputational damage to Dundalk Institute of Technology and an infringement of the rights of employees / students or other relevant third parties.

### **5.2 Compliance Exceptions**

Any exception to the policy shall be reported to the Data Protection Officer in advance.

### **5.3 Non-Compliance**

Failure to comply with this policy may lead to disciplinary action being taken in accordance with the Institute's disciplinary procedures. Failure of a third party contractor (or subcontractors) to comply with this policy may lead to termination of the contract and/or legal action.

Non-compliance shall be reported to the Data Protection Officer.

## Appendix A – Data Retention Schedule

Below is the Data Retention Schedule for DkIT. The Retention period for each record must have an associated legal basis noted. For personal data held, it shall be in accordance with GDPR legislation and utilising one (or more) of the six legal basis used for processing such data. For other Institute records, the legal basis may be GDPR related but also may rely on other various legislation applicable to that type of record. The aim of defining a retention or destruction schedule or procedures for specific categories of records is to ensure legal compliance.

In relation to personal data, Article 5 (e) of the GDPR states that personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. There are some circumstances where personal data may be stored for longer periods (e.g. archiving purposes in the public interest, scientific or historical research purposes).

Recital 39 of the GDPR states that the period for which the personal data is stored should be limited to a strict minimum and that time limits should be established by the data controller for deletion of the records (referred to as erasure in the GDPR) or for a periodic review.

The table below is not intended to be a very comprehensive list of retention periods to be implemented by Schools/Functions in the Institute. There are differences between Schools and Functions in terms of the volume and type of data both personal and non-personal that they collect. Furthermore, the classification of data is not consistent across the Institute and the purposes for which it is used may vary. It is up to School and Function managers to further determine the records within their domain and this Schedule with assist that determination.

The table is intended as a general guide to inform Institute decisions about retention periods. Schools and Functions should review their own retention periods in tandem with the information set out below and implement or adjust in accordance with their own requirements.

RECORD TYPE	RETENTION PERIOD	LEGAL BASIS FOR RETENTION
<b>Governance Records</b>		
Governing Body and subcommittees - minutes and other records	Indefinitely	S.20 Regional Technical Colleges Act, 1992 provides for the inspection of the Institute by officers authorized by the Minister who shall be afforded the opportunity to access records.  It is necessary to retain corporate records for the purposes of running the Institute and demonstrating

		compliance with the Institute's statutory obligations.
Minutes of Executive Board Management meetings	Indefinitely	As above.
Academic Council Elections	6 months after the duration of the Council	As per Institute's statutory obligations and in line with DP principle of data minimisation.
Academic Regulations	Indefinitely	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.
Strategic Plans	Indefinitely	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations to prepare such plans (section 21(c) Regional Technical Colleges Act,1992).
Members of Governing Body/Presidents' Letters of appointment/contract	7 years from date of expiry or termination of appointment/contract	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.
Annual Governance Statement & Statement of Internal Controls	Indefinitely	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.
Institute Policies and Procedures	Retain current until superseded	n/a
Ethics in Public Office records	Indefinitely	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.
Institute Risk Register	7 years after superseded	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating

		compliance with the Institute's statutory obligations.
<b>Accounting and Finance Records</b>		
Budget reports	7 years	Section 16, RTC Act 1992
Fixed Assets Register	7 years	Used as input to financial statements.  It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.
Records documenting the preparation of statutory accounts	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
Annual Financial Statements	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
Audit files as prepared for the Comptroller and Auditor General	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
Records documenting the conduct and results of financial audits, and action taken	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
Records documenting the receipt and payment of purchase invoices	6 years from the termination of obligations under the agreement.	Section 886 of the Taxes Consolidation Act, 1997 (see Revenue Operational Manual Part 38.03.17)
Records documenting the issue of sales invoices, student tuition and fee income, state grant income and the processing of incoming payments (where relevant)	6 years from the termination of obligations under the agreement or arrangement.	Section 886 of the Taxes Consolidation Act, 1997 (see Revenue Operational Manual Part 38.03.17)

Records of the handling of petty cash	6 years from the date of the relevant payment.	Section 886 of the Taxes Consolidation Act, 1997 (see Revenue Operational Manual Part 38.03.17)
Records of opening, closing & routine administering of bank accounts	Indefinitely	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.
Records of standing orders, direct debits	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
Records of routine bank account, deposits, withdrawals, transfers (paying-in slips, transfer instructions, bank statements etc.)	6 years after the end of the financial year containing the latest date to which the record, information or return relates.	Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014 (see above).
<b>Legal Records</b>		
Agreements and contracts under seal (by deed)	13 years from the termination of obligations under the agreement (in order to be able to rely on the deed in legal proceedings based on the deed).  We recommend that deeds be assessed on a case by case basis depending on the importance of the underlying agreement and potentially retained for much longer than 13 years.	Section 11 of the Statute of Limitations 1957 (as amended) plus 1 Year to allow time to receive notice of the claim.
Other agreements and contracts	7 years from termination of contract	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.
Records documenting the provision of legal support and representation in dealing with claims, which do not proceed to litigation or are settled by an agreement.	Indefinitely	It is necessary for the Institute to be in a position to comply with its obligations under settlement agreements and to defend potential claims in circumstances where the Institute is on notice that an

		individual may in future proceed to litigation.
Records documenting litigation between the Institute and third parties where legal precedents are set.	Indefinitely	The Institute must be in a position to ensure ongoing compliance with its legal obligations
Records documenting litigation between the Institute and third parties, which do not set legal precedents.	Indefinitely	It is necessary for the Institute to be in a position to comply with its obligations imposed by courts and to defend potential claims in circumstances where the Institute is on notice that an individual may in future proceed to litigation.
Records documenting legal advice requested by, and provided to, the Institution relating to e.g. :- - interpretation of legislation affecting the Institute's legal framework, governance, responsibilities or operations; - the Institute's relationships with government bodies	Indefinitely	It is necessary for the Institute to be in a position to act in accordance with its legal obligations and to have the ability to retain legal advice where necessary in a cost efficient manner.
Records documenting the acquisition or disposal of ownership of properties.	For the duration of the ownership of the property and potentially indefinitely thereafter, depending on the circumstances	Real Estate Documents should not be destroyed until a case-by-case assessment of their continued relevance has been undertaken (having obtained appropriate legal advice).
Deeds and certificates of title for properties owned by the company.	For the duration of the ownership of the property	Real Estate Documents should not be destroyed until a case-by-case assessment of their continued relevance has been undertaken (having obtained appropriate legal advice).
Records documenting negotiations for properties where the property was not acquired.	7 years	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.
<b>Tax Records</b>		
Records documenting the preparation and filing of tax returns	Returns and statutory filings: 6 Years from the end of the tax year to which they relate.	Section 886 of the Taxes Consolidation Act 1997

	Note: Depending on the nature of any rulings or specific guidance, it may be prudent for these to be kept indefinitely. – e.g. where the Institute is instructed to take a particular course of action by a Local Tax Office/the Revenue Commissioners.	
VAT Records	6 years from the date the record was made.	Section 84 of the Value Added Tax Consolidation Act 2010 Part 5, Revenue Guide to VAT. <a href="http://www.revenue.ie/en/tax/vat/guide/records.html">http://www.revenue.ie/en/tax/vat/guide/records.html</a>
Assessment of Tax liabilities	7 years	No specific statutory provision applies but best practice is to retain such documents for the period under the Statute of Limitations plus 1 Year to allow for receipt of notice of a claim
<b>Insurance Records</b>		
Records documenting the arrangement and renewal of all insurance policies	7 years	To ensure Institute is in a position to ensure ongoing compliance with its legal obligations and allow for potential claims.
Records documenting claims made under insurance policies	7 years from settlement, award or withdrawal of claim	As above
<b>Procurement Records</b>		
Tender documents	7 years	It is necessary to retain corporate records for the purposes of running the Institute and demonstrating compliance with the Institute's statutory obligations.  Section 16, Regional Technical Colleges Act, 1992; as informed by Section 286, Companies Act 2014
Contracts for services	7 years post completion of the contract	As above
Commercial contracts	7 years	As above

Unsuccessful tender documentation	7 years	As above
<b>Enterprise &amp; Innovation</b>		
Enterprise centre and incubation centre client records	Duration of relationship plus 1 year	Administration of relationship with clients
Secondary School Student programmes	6 months	Administration of programmes
Enterprise centre advisory board members	Duration of membership plus 1 year	Statute of Limitations for a breach of contract claim plus 1 year to allow time for receipt of notice of the claim
Erasmus projects	5 years post contract (or as specified in contract)	Administration of programmes
<b>Research</b>		
Postgraduate Research Student Files (application forms, proposals, progress reports, examiner reports, external reviews, stipend payments, etc.)	2007-2013 (retain until 2022); 2014-2020 (retain until 2029), etc.	Article 90 of Council Regulation (EC) No 1083/2006 for the 2007-2013 Programme; Article 140 of Council Regulation (EC) No 1303/2013 for the 2014-2020 Programme
Student Lists, attendance sheets, etc.	18 months post-graduation	Legitimate interest of Institute
Theses	Indefinitely	Record of Institute/academic record
Staff CVs	Duration of employment unless requested otherwise. Updated every 5 years	Administration of research programmes
Minutes of meetings (e.g. admission meetings, postgraduate review group, etc.)	5 years	As above
Externally and Self-Funded Projects	As set down by the funder	Administration of Programmes

### Human Resources Records

#### HR Records: Kept on the employee file

*Insofar as records are kept on the employment file, the employee file should not be altered to satisfy the separate statutory retention requirements for these records.*

*Generally, data required for the implementation and management of pension arrangements should be kept separately from the employee file. However, where this is not kept separately, the employee file should be reviewed at the end of the minimum retention period to allow this data to be extracted for the separate retention period.*

<b>Staff Personnel Files</b>	Duration of employment plus 7 years.	Statute of limitations for a breach of contract claim plus 1
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	Retain service records indefinitely for superannuation/pension purposes.	Year to allow time to receive notice of the claim.
<b>Annual/Sick Leave Records</b>	Duration of employment plus 7 years.	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.
<b>Protected Leave</b> - unpaid Maternity Leave, any kind of exceptional unpaid leave as this relates to pension records adjustments. Paid Maternity and Paternity leave, Parental leave, Carer's leave, Force Majeure Leave.	8 years after the end of the tax year in which the paternity or parental period ends or 7 years after employment ceases, whichever is longer	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.  Section 17, Paternity Leave and Benefits Act 2016; Section 27 of the Parental Leave Act 1998, Section 31 Carer's Leave Act 2001
<b>Vacancy notification</b>  <b>Advert copies</b>  <b>Job descriptions</b>	Indefinitely	This is part of the Institutional record
<b>Shortlisting Reports</b>  <b>Interview Report</b> – panel recommendation & marking sheet.	Indefinitely	This is part of the Institutional record.
<b>Job applications and CVs</b> – both internal and external candidates.	In some cases, a ranked panel of suitable applicants is retained for 1 year from the date of interview.	Statute of limitations for a claim under the Employment Equality Acts 1998 - 2015 plus 6 months, to allow time to receive notice of claim.
<b>Competition files</b>	Retain for 1 year after competition is completed.  Records relevant to applicants will be treated according to whether they were successful or unsuccessful as detailed below.	Under Employment Equality Legislation, a candidate/employee who believes they have suffered discrimination on one of the nine grounds can refer a case to the Equality Tribunal for investigation within 6 months of last alleged act.  Data Protection Commission recommends 12 months.
<b>Pre-employment references</b>	Once probation has been successfully completed	Under the DP principle of data minimisation.

<b>Candidates not qualified or shortlisted</b>	18 months after notifying candidates	Statute of limitations for a claim under the Employment Equality Acts 1998 - 2015 plus 6 months, to allow time to receive notice of claim.
<b>Candidates shortlisted but not successful</b> at interview or who are successful but do not accept offer	18 months after competition is completed	Statute of limitations for a claim under the Employment Equality Acts 1998 - 2015 plus 6 months, to allow time to receive notice of claim.
<b>Progression Board assessment report files</b>	Duration of employment plus 7 years	To satisfy the time limits for any potential legal action arising.
<b>Staff Pre-employment medical examinations.</b>	2 years after appointment	Under the DP principle of data minimisation.
<b>Staff In-service medical examinations.</b>	Duration of employment plus 7 years.	Statute of limitations for a breach of contract claim plus 1 year to allow time to receive notice of the claim.
<b>Staff ID cards across the Institute showing photo and ID number</b>	Duration of employment plus 7 years for photo. ID held indefinitely as id marker.	Contractual basis
<b>Staff Personal email addresses and personal telephone numbers, both landline and mobile</b>	Duration of employment plus 7 years.	Contractual basis, necessary to contact staff during exams, assessments etc., for the purposes of teaching and learning.
<b>Workplace Relations Commission ruling</b>	7 years from date of ruling	May affect terms & conditions of employee(s)
<b>Work permits/visa information</b>	Information relating to the employment holder must be kept for a period of 5 years  <i>or</i>  If the non-EEA national remains in employment for longer than 5 years from the date of the permit, then for the duration of such employment.	Section 27, Employment Permits Act 2006
<b>Staff Appraisal Records &amp; Disciplinary Action</b>	7 years after employment ceases	Statute of limitations for a breach of contract claim plus 1

		year to allow time to receive notice of the claim.
<b>Collective agreements</b> , including past agreements that could affect present employees	Indefinitely	These form part of the terms and conditions of all employees.
<b>Records relating to collective redundancies</b> (including records that would not necessarily form part of the employees' personnel file).	3 years from the date of the collective redundancies	Protection of Employment Acts 1977 – 2014
<b>Industrial relations:</b> minutes of meetings. Correspondence with local/national union reps., negotiations and agreements with employment, contractual and other implications i.e. flexi time; correspondence with the Department of Education & Skills (DOES), and the Technological Higher Education Association (THEA)	Permanently	May affect terms & conditions of employee(s) and forms part of Institute records.
<b>HR Policies and Procedures</b>	Permanently	Forms part of Institute records
<b>Pension/Superannuation Records</b>		
Pension plan and schemes and documents relating to pension schemes	In relation to individual member documents, 7 years after the death of the member and/or spouse/children/other beneficiary  In relation to general governing documents (e.g. Scheme Rules, etc.), indefinitely	Statute of limitations for a breach of contract claim plus 1 year to allow time to receive notice of the claim.  Necessary period to allow effective administration of the scheme and subsequent schemes
Superannuation – Certificates of Service and Benefit Statements	Permanently	Requirement under Pensions Regulations?
<b>Garda Vetting Process</b>		
Vetting Records for both staff and students.  Proof of ID seen and copied by HR vetting officer. Official response originating from Garda Vetting Bureau.	Length of staff employment or student studies plus 1 year or until superseded by another vetting report.	It is a requirement of the Garda Vetting Bureau that copies of the proof of ID records produced to HR are kept: 1. to show that ID was verified and 2. for audit purposes.  Legal obligation

Payroll Records		
Pay Scales	Permanently	Legal obligation to maintain records
Copy payslips	Permanently	Legal obligation to maintain records
Payroll and salary records including Timesheets (weekly, monthly and part-time staff)	7 years after employment ceases  or 7 years from the financial year-end in which payments were made, whichever is longer	Statute of limitations for a breach of contract claim plus 1 year to allow time to receive notice of the claim.  Section 22, National Minimum Wage Act 2000
Employee bank details	While employment continues and up to six months after employment ends	Necessary period to effectively administer payments due to the employee on foot of their contract of employment.
Records of staff expenses	7 years after employment ceases	Statute of limitations for a breach of contract claim plus 1 year to allow time to receive notice of the claim.
Payroll instructions from HR	6 years following the end of the financial year to which the record relates or in which the record is created, whichever is the later	Legitimate interests of Institute
P30s - monthly return to Revenue Commissioners.	6 years following the end of the financial year to which the record relates or in which the record is created, whichever is the later	Legitimate interests of Institute
P35s and P60s	6 years following the end of the financial year to which the record relates or in which the record is created, whichever is the later	Legitimate interests of Institute and necessary for performance of obligations arising from employer/employee relationship
Deduction forms, returns and reports on non-statutory deductions from wages and salaries including lists of amounts paid over to third parties i.e. VHI, Unions, AVCs etc.	6 years following the end of the financial year to which the record relates or in which the record is created, whichever is the later	Legitimate interests of Institute and necessary for performance of obligations arising from employer/employee relationship
Returns and reports to Revenue, HEA and other external bodies such as Office of Government Procurement,	6 years following the end of the financial year to which the record relates or in	Legitimate interests of Institute

Financial Returns, Withholding Tax, RCT (Relevant Contracts Tax ), etc.	which the record is created, whichever is the later	
SAF (Student Assistance Fund) payments	6 years following the end of the financial year to which the record relates or in which the record is created, whichever is the later	Legitimate interests of Institute
<b>Student Records</b>		
Records of Successful Applicants	Duration of Study plus 1 year	Necessary for the performance of obligations arising from the student/Institute relationship
Records of Unsuccessful Applicants	18 months	Statutory Limitation period for a claim under the Equal Status Acts 2000 – 2015, plus six months to allow time for receipt of notice of the claim
Student Discipline Records - Minor Offences	Duration of study plus 1 year	Statute of Limitations for a breach of contract claim plus 1 year to allow time for receipt of notice of the claim
Student Discipline Records - Major Offences	Duration of study plus 7 years  If the major offence is a matter of public importance, it may be necessary to keep these records for longer.	Statute of Limitations for a breach of contract claim plus 1 year to allow time for receipt of notice of the claim  If the major offence is a matter of public importance, it may be necessary in the legitimate interests of the institution to maintain records for a longer period.
Documentation relating to all applications for student assistance fund, personal details, financial income & expenditure details	10 years  If ESF/EU funded - 13 years	Required for financial audits in compliance with Section 886 of the Taxes Consolidation Act 1997
Applications to Progress and Carry or Repeat and Attend	13 months except where there are fees outstanding	Necessary for the performance of obligations arising from the student/Institute relationship
Basic Student Registration details (electronic version)	Indefinitely, unless the student raises an objection to same	Legitimate interests of the Institution in allowing the Institution to respond to student queries and confirm identity and qualifications of student.

Medical Cert/Absence record	1 academic year	Necessary for the performance of obligations arising from the student/Institute relationship
Change of Name/Address Record	Duration of study or 3 years whichever is longer	Necessary for the performance of obligations arising from the student/Institute relationship
I.D. Card Record	Duration study plus 1 Year	Necessary for the performance of obligations arising from the student/Institute relationship
Waive of Fee application	Application details held for duration of the programme or reasonable duration of study period. <b>Fee approval record</b> held for 10 years	Required for financial audits in compliance with Section 886 of the Taxes Consolidation Act 1997
Graduation In Absentia payment file	Indefinitely	Legitimate interest of data subject. Proof of payment of fee for issue of parchment in absentia.
Course Timetabling Record	Indefinitely as a back-up record of hours completed by staff.	Employment Equality Acts 1998 - 2015
<b>Exam Records</b>		
Examination Scripts & Continuous Assessments	18 months after exam board to factor in appeals process	Legitimate interest of data subject.
Module Grade Records	Duration of course plus 1 Year	Legitimate Interest of data subject
Examination Appeals Documents	7 years after the appeal, or whenever the student ceases to be a student, whichever is longer	Statute of limitations for a breach of contract claim plus 1 year to allow time for receipt of notice of the claim
Conferring Records	10 years hard copy or Indefinitely on Student Record System	Legitimate interests of the Institution in allowing the Institution to respond to student queries and confirm identity and qualifications of student.
Examination results - broadsheets	Indefinitely	Legitimate interest of Data subject, maintained indefinitely to accommodate students returning years later seeking evidence of completion of modules, programme etc.
Exam Breach Record	Duration of study plus 7 years	Statute of Limitations for a breach of contract claim plus 1

	If it is type of breach, which is a matter of public importance, it may be necessary to keep these records for longer.	year to allow time for receipt of notice of the claim  If the major offence is a matter of public importance, it may be necessary in the legitimate interests of the institution to maintain records for a longer period.
Invigilator C.V.'s	18 months	Legitimate interest of data subject.
Invigilator Pay Claim	7 years after employment ceases  <i>or</i>  7 years from the financial year-end in which payments were made, whichever is longer	Statute of limitations for a breach of contract claim plus 1 Year to allow time to receive notice of the claim.  Section 22, National Minimum Wage Act 2000
Repeat Exam Application records	13 months	Necessary for the performance of obligations arising from the student/Institute relationship
Requests for Transcripts/Parchments	6 months from completion of task	Legitimate interest of data subject.
<b>Library Records</b>		
Student information to set up library accounts is transferred from the Banner database system	Duration of course plus 1 year.	Necessary for the performance of obligations arising from the student/Institute relationship
Staff information to set up library accounts	Duration of staff contract.	Necessary for the performance of obligations arising from the staff/Institute relationship
Catalogue bibliographic records (book records)	Held as long as the item is held in the library	Delivery of service
Financial Records	2 years in library. Originals in finance held 7 years.	Section 886 of the Taxes Consolidation Act 1997
Borrowing Records	2 years following the cessation of the student on a course/the cessation of employment of a staff member	Obligation to ensure the integrity of the Library collection in furtherance of its public interest objective S.5 Regional and Technical Colleges Act 1992
Electronic Publications	Updated on ongoing basis	To further its public interest objective under S.5 Regional and Technical Colleges Act 1992

Print subscriptions and electronic subscriptions to Journals	Updated on ongoing basis	Delivery of service
Undergraduate dissertations (Theses), Post Graduate Dissertations, Theses research and Taught Masters.	Permanently	Forms part of academic and Institute records.
<b>Careers Office Records and Alumni</b>		
Job Applications	1 year	Operational requirement for careers office to assist students in furtherance of the Institute's public interest objective under S. 5 Regional and Technical Colleges Act 1992
First destination statistics of graduates	Indefinitely	Operational requirement to tailor services for the legitimate interests of current and prospective students.
Employment database – list of employers who contact the Careers Service with job opportunities for graduates	Yearly update, retain until employer revokes consent to remain on the list.	Operational requirement to provide job opportunities for students.
<b>ALUMNI:</b> Graduates' personal information including name, address, date of birth, places of employment, type of employment, etc.	Yearly update with consent from Alumni members	Operational requirement to provide service to graduates – in their legitimate interest
<b>Academic Faculty/School/Department Records</b>		
School Publications	Permanently	For archive and reference purposes. Legitimate interest of Institute
Programmatic Review Documents	Permanently	Legitimate interest of Institute as historical background to programmes of study offered.
Minutes of meetings (e.g. management, course boards, special purpose committees, etc.)	Permanently	For archive and historical reference purposes. Legitimate interest.
Approved Course Schedules	Duration of Programme plus 1 year	Necessary for the performance of obligations arising from the student/Institute relationship
Exam Question Papers	Permanently	For archive and reference purposes. Legitimate interest of Institute and students.

Exam Solutions	18 months	Necessary for the performance of obligations arising from the student/Institute relationship
<b>Buildings &amp; Estates Records</b>		
Physical Planning Records	7 years	Legitimate interest of Institute
Capital Works Expressions of Interest	2 Years	Allow adequate time for processing of appeals.
Capital Works Tenders Submitted	3 Years or duration of contract, or longer if necessary	Allow adequate time for processing of appeals.
Capital Works Tender File Successful Candidate	Indefinitely	In case of latent defect discovery.
Minor Works Expressions of Interest	2 Years	Allow adequate time for processing of appeals.
Minor Works Actual Tenders Submitted	3 Years or duration of contract, or longer if necessary	Allow adequate time for processing of appeals.
Minor Works Tender File	7 Years	In line with Financial Records, legal (audit) obligations
Non-Capital (Goods and Services) Tenders Expressions of Interest	2 Years	Allow adequate time for processing of appeals.
Non-Capital Tenders Submitted	3 Years	Allow adequate time for processing of appeals.
Non-Capital Tender File	7 years	In line with Financial Records, legal (audit) obligations
Contract Safety Files	Indefinitely	Legitimate interest of Institute
Planning permission grants and associated applications and Appeals, all relevant associated correspondence and documents	Indefinitely	Archived for reference purposes.
Contract Documents and conditions of agreement	Indefinitely	Legitimate interest of Institute
Contractor safety documentation, permit to work docs	Indefinitely	Legitimate interest of Institute
Property – Campus Plan & Land Maps	Indefinitely	Legitimate interest of Institute
Fire Certificates	Until superseded	Legal obligation
Inspection Records	7 years from date of inspection	Legal obligation

CCTV	30 days, unless required for investigation	Performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.
<b>IT Records</b>		
Network Account Information on Active Directory (Students)	1 year after they have finished their studies	Vital interests of students (Prevention of fraud / ensuring network and information security / Misuse of Service / processing client data)
Network Account Information on Active Directory(Staff) Network Account Information on Phone System	Within 1 year of staff member leaving	Vital interest of staff (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee data)
Phone system billing/call information	2 Years	Legitimate interest of Institute (Prevention of fraud / Misuse of Service)
General Physical Access Control System & Logs	1 Year	Legitimate interest of Institute (Prevention of fraud / Misuse of Service)
ID Production	Indefinitely	Legitimate interest of Institute (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee/client data)
Network Account Information on Card Management System	1 year after students finish their studies	Legitimate interest of Institute (Prevention of fraud / Misuse of Service)
Print Transaction Logs	1 academic year	Legitimate interest of Institute (Prevention of fraud / Misuse of Service)
VLE Records (e.g. Student/Staff & Module Information, Database & Logs)	4 years	Legitimate interest of Institute (ensuring network and information security / Misuse of Service / processing client data)
Plagiarism Prevention	Indefinitely	Exercise of official duties of Institute – legal obligation to ensure integrity of educational awards.

Account Provisioning Application/Database  System holds ID number and last email address in case student registers again.	Indefinitely	Legitimate interest of Institute and data subject (ensuring network and information security / Misuse of Service / processing employee/client data)
Help Desk Records	5 Years	Legitimate interest of Institute (ensuring network and information security / Misuse of Service / processing employee/client data)
Staff Email Account	Duration of employment for current Staff Kept up to 1 Year after Staff Member Leaves (in case of re-joiners)	Legitimate interest of staff member (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee data)
Staff Email Message Contents	5 years	Legitimate interest of staff and Institute (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee data)
Student Email Account & Contents	5 years	Legitimate interest of Institute and students (Prevention of fraud / ensuring network and information security / Misuse of Service / processing student data)
Email Logs – staff & students	1 month	Legitimate interest (Prevention of fraud / ensuring network and information security / Misuse of Service / processing student/staff data)
Personal File Share/Doc Management Database Account & Contents	Indefinitely for Staff Students information deleted 1 year after they leave	Legitimate interest (Prevention of fraud / ensuring network and information security / Misuse of Service)
Departmental File Share/Doc Management Information	7 years	Legitimate interest (Prevention of fraud / Misuse of Service / processing employee/client data)
Language Lab System	5 years  Staff – 1 Year after they leave	Legitimate interest (ensuring network and information security / Misuse of Service /

	Students – 1 Year after they leave	processing employee/client data)
Timetabling Room Information Name, ID, Programme,	5 years	Legitimate interest (ensuring network and information security / Misuse of Service / processing employee/client data)
Network Traffic Logs	6 months	Legitimate interest (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee/client data)
Logs (e.g. web activity logs, Wi-Fi provider logs, VC system/video delivery/collaboration logs)	1 Academic Year	Legitimate interest (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee/client data)
Wi-Fi Activity	1 Academic Year	Legitimate interest (Prevention of fraud / ensuring network and information security / Misuse of Service / processing employee/client data)
Web Text Service	1 Academic Year	Legitimate interest (processing employee/client data / Notification of outages, Health & Safety, Campus Security, extreme weather alerts etc.)
IT Equipment bookings records	1 Academic Year	Legitimate interest Registration/Admissions/HR
Antivirus logs	6 months	Legitimate interest (ensuring network and information security / Misuse of Service / processing employee/client data)
Disaster Recovery Plan (incl HW and SW Listing, Network Architecture Diagrams)	Indefinitely	Forms part of Institute record.
Listing of Software/Software Licences	7 years	Legitimate interests of Institute
Vendor Information (Preferred IT Suppliers)	5 years	Legitimate interests of Institute
Tender Responses (IT)	7 years	Legitimate interests of Institute
Tender Contracts	7 years	Performance of a contract

<b>Information Request Records</b>		
<b>Freedom of Information (FOI) Records</b>		
FOI Request Records (including OIC correspondence where applicable)	Current + 3 years	As agreed at THEA FOI Network Meeting 13 October 2016
FOI Request Logs	7 years	Legitimate interests of Institute
FOI Request Statistical Returns	Permanently	Code of Practice for Public Bodies dated September 2015 (Section 48 Freedom of Information Act 2014)
FOI Disclosure Log	Permanently	Code of Practice for Public Bodies dated September 2015 (Section 48 Freedom of Information Act 2014)
Publication Scheme	Updated on ongoing basis	Forms part of Institute records
FOI Training Records	7 years	Legitimate interest of Institute
<b>Data Protection (DP) Records</b>		
DP Rights Request Records (including DPC correspondence where applicable)	7 years	Limitation Period for a claim under Data Protection Act 2018
DP Rights Request Log	7 years	Limitation Period for a claim under Data Protection Act 2018
DP Breach records	7 years	Limitation Period for a claim under Data Protection Act 2018
DP Breach Log	7 years	Limitation Period for a claim under Data Protection Act 2018
DP Training Records	7 years	Legitimate interest of Institute.
Data Processor Agreements/Data Sharing Agreements	Duration of agreement plus 1 year	Legal obligation as per GDPR / DP Act 2018
Records of Processing Activities	Updated on ongoing basis	GDPR / DP Act 2018
Data Protection Impact Assessments (DPIAs)	7 years	Limitation Period for a claim under Data Protection Act 2018
Privacy Notices	Updated on ongoing basis	GDPR / DP Act 2018
<b>Ombudsman Records</b>		
Ombudsman Request Logs and investigations	7 years	Statutory Limitation Period for the majority of potential claims which may be brought if the request is unsuccessful, together with a year to receive notice of the claim.

<b>Health Centre/Medical Records/Medical Research</b>		
Anonymised Stats/Reports	8 years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Bills/Invoices	8 years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Equipment maintenance logs, records of service inspections	8 years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Incident Report Forms	8 Years after last contact or Indefinite in the event of litigation	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Notifiable Diseases Book record	6 Years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Patient Prescriptions	8 Years after last contact or Indefinite in the event of litigation	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Student Health Centre PPPG's (Policies, Procedures, Protocols, Guidelines)	8 years	As per NHO 'National Hospitals Office, Code of Practice for Healthcare Records
General Patient (adult) Healthcare records	8 years after last contact or death, unless in the interest of the Data Subject to retain	As per NHO 'National Hospitals Office, Code of Practice for Healthcare Records  Article 9(a) The data subject has given explicit consent to the processing.
Death Records	10 years after death	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Children and young people (all types of records relating to children and young people)	Retain until the patient's 25th birthday or 26th if young person was 17 at the conclusion of treatment, or 8 years after death. If the illness or death could have potential relevance to adult conditions or have genetic implications, the advice of clinicians should be sought as to whether to retain the records for a longer period	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records  Article 9(a) The data subject (or representative) has given explicit consent to the processing

Maternity (all obstetric and midwifery records, including those of episodes of maternity care that end in stillbirth or where the child later dies)	25 years after the birth of the last child	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records  Article 9(a) The data subject has given explicit consent to the processing
Mentally disordered persons (within the meaning of the Mental Health Acts 1945 to 2001)	20 years after the date of last contact between the patient/client/ service user and any healthcare professional employed by the mental health provider, or 8 years after the death of the patient/client/service user if sooner	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records  Article 9(a) The data subject (or representative) has given explicit consent to the processing
Clinical trials of investigational medicinal products – healthcare records of participants that are the source data for the trial	20 years. It is the responsibility of the Sponsor/someone on behalf of the Sponsor to inform the investigator/institution as to when these documents no longer need to be retained	European Commission Directive 2005/28/EC of 8 April 2005
Clinical trials of investigational medicinal products – healthcare records of participants that are the source data for the trial	20 years. It is the responsibility of the Sponsor/someone on behalf of the Sponsor to inform the investigator/institution as to when these documents no	European Commission Directive 2005/28/EC of 8 April 2005
Homicide or 'Serious untoward Incident' records	30 Years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Body fluids / aspirates / swabs	48 hours after the final report issued by lab	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Records/documents related to any litigation	All records to be reviewed. Normal review 10 years after the file is closed	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
Records of Destruction of Individual Healthcare records (case notes) and other health related records contained in this retention schedule (in manual or computer format)	Permanently	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records

Suicide – notes of patients having committed suicide	10 Years	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records
<b>Disability/Counselling Records</b>		
Statistics on students with special needs. Anonymously held.	Indefinitely.	Forms part of Institute records
Annual report on disability service	Indefinitely	Forms part of Institute records
Confidential information on students with special needs	FSD Funding 8 Years after funding period ends	Article 9(a) The data subject has given explicit consent to the processing  Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Financial statistics	Indefinitely	Forms part of Institute records
Invoices for support payment	FSD Funding 8 Years after funding period ends	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Note taker Agency Records	FSD Funding 8 Years after funding period ends	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Note takers Details	FSD Funding 8 Years after funding period ends	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Note takers claim sheets	FSD Funding 8 Years after funding period ends	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Records on funding from the DOES	Indefinitely	Forms part of Institute records
Taxi Service Providers Records	FSD Funding 8 Years after funding period ends	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.

Confidential student records, case notes, assessment reports and recommendations.	7 years (Students will be informed that they will be destroyed after 7 years and given option to take them themselves)	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records - Retain for the period of time appropriate to the patient  Article 9(a) The data subject has given explicit consent to the processing
Student Medical Record System	8 years after last contact (or death), unless in the interest of the Data Subject to retain. In case of litigation may require longer retention	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records - Retain for the period of time appropriate to the patient Article 9(a) The data subject has given explicit consent to the processing
Electronic appointments booking record	7 Years, except in the case of litigation.	Article 6 (a) The data subject has given consent to the processing
Psychology records	Retain for the period of time appropriate to the patient/ specialty, e.g. mentally disordered persons (within the meaning of the Mental Health Acts 1945 to 2001) 20 years after the last entry in the record or 8 years after the patient's death if patient died while in the care of the organisation	As per HSE 'National Hospitals Office, Code of Practice for Healthcare Records Article 6 (a) The data subject has given consent to the processing
<b>Access Office</b>		
1916 Bursary	7 Years	Article 9(a) The data subject has given explicit consent to the processing  Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Access Course (includes College of Sanctuary applications)	Indefinitely	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
SAF Applications	2007-2013 held until 2022; 2014-2020 - held until 2029	Article 9(a) The data subject has given explicit consent to the processing  Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.

Peer Assisted Student Support Records	Pseudonymised data retained for five years to ascertain efficiency of programme. Statistical Reports held indefinitely.	Article 6(c) Processing is necessary for compliance with a legal obligation to which the controller is subject.
Graduates' personal information Including name, address, date of birth, places of employment, type of employment, etc.	Data will be retained on the list until consent has been removed.	Article 6(a) The data subject has given consent to the processing
<b>Marketing Department</b>		
Promotional literature - prospectuses, brochures, magazines	Indefinitely	Archive / reference purposes
Promotional literature produced by Irish and international HEIs	Indefinitely	Archive / reference purposes
Media monitoring of Institute	Indefinitely	Archive / reference purposes
Data regarding feeder schools	13 Months	Article 6(a) The data subject has given consent to the processing
Summer School Events	12 Months	Article 6(a) The data subject has given consent to the processing
School Visit documentation	Indefinitely	Archive / reference purposes
Website (Photographs, etc.)	Updated regularly. Items removed on request of DS is necessary.	Article 6(a) The data subject has given consent to the processing
Higher Options Student detail capture	13 Months	Article 6(a) The data subject has given consent to the processing
Eventbrite surveys	Until Survey is complete	Article 6(a) The data subject has given consent to the processing

**List of Supporting Legislation and/or Documentation to be reviewed in tandem with this Policy**

**Primary Legislation (all as amended):**

Regional Technical Colleges Act 1992 / Amended 1994

Institutes of Technology Act 2006

Technological Universities Act 2018

Higher Education Authority Act 2022

National Archives Act 1986

Qualifications and Quality Assurance (Education & Training) Act 2012

Disability Act 2005

Student Support Act 2011

Pensions Act 1990

Public Service Superannuation (Miscellaneous Provisions) Act 2004

S.I. No. 290/2015 Education Sector Superannuation Scheme 2015 or the ESS 2015

Payments of Wages Act 1991

Social Welfare Act 2000 – Sect 32

Terms of Employment Act 1994-2012

Fixed Term Work Act 2003

Employment Equality Act 1998 to 2015

Equality Act 2004

Equal Status Act 2000 to 2015

Gender Recognition Act 2015

Children’s Act 2015

National Vetting Bureau Act 2016

Public Service Pensions (Single Scheme and other Provisions) Act 2012

Parents Leave & Benefit Act 2019

Data Sharing & Governance Act 2019

## **Secondary Legislation (all as amended)**

Ethics in Public Office 1995

Education Act 2012

Protection of Employees (Part-time) Act 2001

Safety, Health and Welfare at Work Act 2005

Organisation of Working Time Act 1997 (SI No 465 of 1997)

Ombudsman Act 1980

Social Welfare Act 2000 (Sect 32)

Maternity Leave Acts 1994-2004

Adoptive Leave Act 1995

Parental Leave Acts/Force Majeure Leave 1998-2019

Carer's Leave Act 2001

Terms of Employment – Unfair Dismissals Acts 1977-2007

Terms of Employment - Redundancy Act 1967 – 2007

Industrial Relations Acts 1946 - 2012

Public Service Management (Sick Leave) Regulations 2014 as amended by the Public Service Management (Sick Leave) Amendment 2015

Education Section Superannuation Scheme 2015

## **Dundalk Institute of Technology Policies/Procedures/Guidelines:**

Data Protection Policy & Procedures 2019

Personal Data Breach Management Policy & Procedures 2019

Subject Access Request Policy 2019

Records Management Policy 2020

Anonymization & Pseudo. Policy 2019

Clean Desk Policy 2019

Employee Confidentiality Policy 2019

Encryption Policy 2019

Photography & Video Policy 2019

Acceptable Usage Policy 2019

Compliance Policy 2019

Anti-Virus Scanning & Protection Standard 2019

Data Governance Policy 2019

End User Guidelines 2019

Firewall Policy 2019

Information Security Policy 2019

IT Document Framework 2019

Logical Access Policy 2019

Outsourcing 3<sup>rd</sup> Party Policy 2019

Password Standard 2019

Physical Access Policy 2019

Privileged User Policy 2019

Remote Access Policy 2019

Wireless Usage Policy 2019

Social Media Management Policy 2019

This is not an exhaustive list of Policies, Procedures and Guidelines. Other policy documentation currently in existence or subsequently approved may need to be consulted.