

**Student Data Protection – Privacy Notice**

**2019/20 Academic Year**

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**Background**

This privacy notice explains how the Institute of Technology Sligo (IT Sligo) collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of the Institute.

IT Sligo is the data controller of all personal data that it holds and processes. IT Sligo is subject to the Data Protection Acts 1998 to 2018 and to the General Data Protection Regulation (GDPR) which came into force on 25th May 2018.

**How IT Sligo uses Student Data**

As a student of IT Sligo, some of your personal data will be processed by the Institute. The data held by IT Sligo is collected from a range of sources including the CAO and directly from yourself during the application and registration process. During the course of your studies, additional information is added to your record. Personal information held by IT Sligo is treated with the highest standards of security and confidentiality in accordance with data protection legislation.

**Types of Information Collected**

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, and services provided.  It may obtain, hold and process the sensitive personal data and special category data of students including racial or ethnic origin, and physical or mental health.

The following types of personal data may be collected;

* Name, contact information (address, email address, telephone numbers), date of birth, PPS number, passport number, nationality and country of domicile
* Information relating to education and training records
* Information relating to family and social circumstances
* Sensitive personal data and special category data including physical or mental health, racial or ethnic origin
* Certain criminal history (The National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016 provide a statutory basis for mandatory vetting of persons who wish to undertake a work placement and/or activities that bring them into contact with children and/or vulnerable adults. Some programmes at IT Sligo require students to undertake mandatory placements with external agencies, which will bring them into contact with children and/or vulnerable adults and in which they will assume positions of public trust. The Institute is committed to ensuring that only suitable candidates are allowed to undertake these programmes. Apart from the listed programmes, any students who engage in or are in the vicinity of activities that may involve unsupervised access to children and/or vulnerable adults will also be subject to the Institute’s Vetting processes.

**Legal Basis for Processing Personal Information**

We process your personal data because it’s necessary in order to:

* Fulfil our contractual obligations with you;
* Comply with legal obligations that apply to us;
* Perform functions conferred on us by law and which are carried out in the public interest;
* Perform tasks to which you have consented.

**What information do we collect about you?**

 The types of personal data processed by IT Sligo include, inter alia:

* Student ID number(s)
* Name, date of birth, country of birth, nationality and telephone numbers
* Addresses (home and term addresses)
* PPS number
* Email address
* Next of kin/emergency contact details
* Details of previous examination results
* Schools/colleges attended
* Course application details
* Image in digital photograph for ID card and Class Lists
* Financial information (including bank details and details of funding and fees paid & outstanding)
* Academic history
* Academic marks
* Attendance records
* Qualifications awarded
* Engagement with IT system, LearnOnline/Moodle activity and use of facilities such as the library
* Health and disability information
* Information regarding Parents: socio economic grouping, occupation and employment status
* Gender
* Religion
* Ethnic origin
* Disciplinary information
* Details of criminal convictions in accordance with the IT Sligo Student Vetting Policy and [IT Sligo Criminal Convictions Policy](https://itsligo.ie/student-hub/student-help/student-charter)
* CV
* Image in CCTV footage/photography/filming.

**Sensitive Personal Data**

Some of the information about you that the Institute holds, such as your ethnic origin, is classified as sensitive personal data. Where sensitive personal data is concerned, we process it where:

* You have provided your explicit consent;
* It’s necessary for the purposes of preventative or occupational medicine, for the general provision of medical care and, in some instances, for medical diagnosis;
* It’s necessary for employment/social security purposes
* It’s necessary for research or statistical purposes e.g. to meet Government requirements, to monitor whether our equal opportunities policies are working and to ensure that disabled students and other under-represented groups receive appropriate support.

In addition to the normal standards of confidentiality, we also carefully control access to sensitive data within the Institute so that it is only available to people who 'need to know'.

**Purpose of Collecting Information**

The Institute holds the personal data and sensitive personal data/special category data of its students in order to implement and manage all services and processes relating to students, including student recruitment, admission, registration, teaching and learning, examination, graduation and other services such as accommodation, student support and careers.  Only information required for these purposes is obtained and processed, and without it the Institute may not be able to provide its services.  Information is passed between various sections of the Institute for operational reasons as is necessary and proportionate for intended purposes.

The purposes for which IT Sligo may process your personal information include:

* Recruitment
* Admission and Registration
* Academic Affairs – teaching and learning, assessment, examination, graduation, attendance, grievance and disciplinary issues
* Provision of Card services
* Provision of IT Services
* Provision of Library Services
* Provision of student support services (Student Engagement, Access, Disability, Learning Support, Careers and Counselling, Medical Centre)
* To administer the financial aspects for your registration as a student (payment of fees, debt collection, financial supports, scholarships, prizes and bursaries)
* Research and Statistical Analysis
* To provide information to organisations such as the HEA in line with legal and government requirements
* To administer voluntary surveys of student opinion about your experience and the performance of the Institute
* To create and publish print & electronic material (e.g. prospectus, brochures, website, etc.) for promotional and archival purposes
* To assist with law enforcement or where required or authorised by law
* To confirm the details of your academic achievements, and for statistical and historical purposes, a core record of your studies is retained indefinitely
* Provide information to Sporting and Society Organisations who may require student data (e.g. Date of birth, confirmation they are in full-time education) prior to the student representing the Institute in formal events/competitions.
* To administer your studies, record academic achievements and determine/record your overall award outcome
* To support you in your studies - we may use information you have given us (for example: disability details to identify appropriate Assistive Technology) and information we collect about your engagement with our services (such as Moodle) to identify students who require additional support or specific services and enable analytics for reporting purposes (such as student progress and academic performance)
* To monitor and evaluate the student experience
* To identify you and enable you to access resources by means of your ID cards
* To enable effective communication with you
* To manage Institute facilities and services including computing, library, careers,
* To administer appeals, complaints, grievances, disciplinary matters, and matters relating to conduct and cheating / plagiarism
* To ensure your health, safety and well-being
* To comply with statutory reporting requirements
* To produce reports and aggregated statistics for management and research purposes in order to plan and improve services
* To contact you on behalf of other students/staff regarding completion of voluntary surveys related to course projects
* To maintain a CCTV system for security & safety purposes
* To enable our continued contact with you during and after you complete your studies (e.g.: survey of graduate work destinations, alumni networks, marketing (for example profile of different groups of students from a particular town etc.)
* To respond to requests for information made under data protection legislation.

Additional processing may be required for students registered on specific programmes (Early Childcare and Social Care) or with certain funding requirements or for students who choose to pursue studies abroad.

**Does IT Sligo share your data with third parties?**

The Institute undertakes to maintain your information securely and restricts access to employees, professional advisers, and data processors on a strictly need to know basis.

Below are examples of when the Institute will release data about you to third parties (i.e. outside IT Sligo) where we have a legitimate reason in connection with your time here at the Institute.

**IT Sligo may share your relevant personal data with bodies including the following:**

* Higher Education Authority (HEA)
* Quality and Qualifications Ireland (QQI)
* Student Universal Support Ireland (SUSI) for grant eligibility purposes
* Department of Employment Affairs and Social Protection to verify employment status and eligibility for payments from that Department
* Revenue Commissioners
* Professional and regulatory bodies where programmes are accredited by such bodies
* Work placement providers
* Employers and SOLAS where students are studying as an apprentice
* Other higher education institutions, partners or research organisations to which a student transfers or pursues an exchange programme or where a student’s programme is being run collaboratively
* Connaught Ulster Alliance – regarding application to become a Technological University
* Software providers or service providers performing administrative functions on behalf of IT Sligo (e.g.: IT services, call centre support, etc.)
* Suppliers of Library online databases (e.g. EBSCO), Reference Tools (e.g. Clarivate Analytics) and other library tools and resources
* IT Sligo Students’ Union to facilitate communications and student elections
* External examiners
* Direct mail agencies/printing companies to facilitate the delivery of mailshots on behalf of the Institute
* Plagiarism detection service providers (e.g.: Turnitin) to ensure academic standards
* Potential employers/recruitment companies for verification of qualifications
* Irish Survey of Student Engagement (ISSE)
* Insurance companies in respect of accidents occurring within the Institute
* Institute legal advisors
* An Garda Síochána to assist in the prevention or detection of crime
* Auditors.

We also share some non-sensitive student data with the Technological Higher Education Association (THEA) for statistical research. THEA is the representative body for the Institutes of Technology and Technological Universities. THEA works on our behalf to support our aims and objectives by using collated data to undertake research and to promote our activities. No individual student will be identifiable in any reports or produced by THEA using anonymised collated data.

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

**Parents, Guardians and other Relatives**

It is your responsibility as a student to communicate and engage with the Institute. Other than persons under the age of 18 years, IT Sligo will not normally disclose your data to parents or relatives without your consent, other than in exceptional circumstances such as where there is potential danger to the health or well-being of a student. We may agree to discuss matters relating to you with a parent/relative but only if you consent to this. Exceptionally, where urgent communication with a student through direct contact details is not possible or has, following repeated attempts, been unsuccessful, contact may be via a student’s parents and/or next of kin using contact details provided by the student.

In the case of students aged under 18 years of age, IT Sligo will communicate with parents or guardians and seek parental/guardian’s consent for the students participation in certain activities such as student vetting.

**Publications**

All graduating students, including those graduating in absentia, will have their name, home town, award and classification listed in the graduation booklet. The graduation ceremonies are streamed live on the internet and are recorded for publication on the internet and for archival purposes. Many IT Sligo events are recorded and streamed/published on the IT Sligo website.

**Website Privacy Policy**

The [IT Sligo website privacy](https://www.itsligo.ie/files/2017/05/ITS-Information-Security-Policy_V0.2-1.pdf) policy explains how data may be gathered about users of the Institute’s website.

**How IT Sligo will contact you**

We may contact you by telephone, email (to your student email account) or post. In addition, if you have provided us with your mobile number, we may text you with Institute-related information e.g.: exam information, grant information, appointment reminders, etc.

**Submission of Information to the HEA**

We share student record and survey data that we collect from you with the Higher Education Authority (HEA) so they can perform their statutory functions under the Higher Education Authority Act, 1971. This data may come from the following sources:

* Student record data (SRS) based on institution’s registration data
* Data from the voluntary Equal Access Survey
* About nine months after you graduate, we may contact you to ask you to fill in 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 studies, 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 of results, for example, by gender or full-time / part-time. 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.

**For further information, please refer to the HEA Student Collection Notice available** [**here**](https://www.itsligo.ie/student-hub/)

**Subject Access Requests & Data Subject Rights**

The GDPR gives data subjects the right to access personal information held about them by the Institute. The purpose of a subject access request is to allow individuals to confirm the accuracy of personal data and check the lawfulness of processing to allow them to exercise rights of correction or objection if necessary. However, individuals can request to see any information IT Sligo holds about them which includes copies of email correspondence referring to them or opinions expressed about them.

Data subjects have a number of rights under GDPR. These include:

* Right of Access;
* Right to Rectification;
* Right to Erasure (sometimes referred to as the Right to be Forgotten);
* Right to Restriction of Processing;
* Right to Data Portability;
* Right to Object to Direct Marketing;
* Right to Object to Automated Decision Making, including Profiling.

Under the GDPR it is your right to obtain details about how your data is processed by IT Sligo and to request a copy of any personal data that IT Sligo holds on you. This is outlined in section 5.14 of the Institute’s Data Protection policy available [here](https://www.itsligo.ie/files/2018/06/IT-Sligo-Data-Protection-Policy.pdf). If you would like to make a request to obtain a copy of personal data that we hold on you, you can do so by downloading the [Subject Access Request Form](https://www.itsligo.ie/files/2018/06/Subject-Access-Request-Form.docx) available on our website <https://www.itsligo.ie/dataprotection/subject-access-requests/> completing same and returning to the Data Protection Officer at the contact details below.

**Data Retention**

IT Sligo retains your personal data for the purposes described in this notice. The Institute will not hold your data for any longer than is necessary, but some data will be held indefinitely in order, for example, to verify your award, provide transcripts of your marks, and provide opportunities for further study, careers support, alumni and networking services. More information on our retention schedule is available on request.

**Questions and Complaints**

If you are not satisfied with the Institute’s handling of your personal data or believe that the requirements of data protection legislation may not be fully complied with, you should contact the Institute’s Data Protection Officer in the first instance. You also have a right to make a complaint to the Data Protection Commissioner. Please refer to the following websites for further information:

<https://www.dataprotection.ie/docs/Home/4.htm> & <http://gdprandyou.ie/>

**How to Contact us:**

**Contact Details:** Email: Louise Kinane, Data Protection Officer at dataprotection@itsligo.ie or by post to Institute of Technology Sligo, Ash Lane, Sligo F91 YW50. If you need further information please refer to our website <https://www.itsligo.ie/dataprotection/>.