



## **General Data Protection Regulation (GDPR)**

### **Student Data – Privacy Notice**

# Background

This privacy notice explains how the Institute 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.

The Institute is the data controller all personal data that it holds and processes and is subject to the Data Protection Acts 1998 and 2003 and to the General Data Protection Regulation (GDPR) from 25 May 2018.

## 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 Cork Institute of Technology (CIT) 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.

# How we Collect Information

Personal data and sensitive personal data/special category data held by the Institute relating to students is obtained directly from the student or applicant, or in some cases from a third party organisation involved in the services provided by the Institute that has obtained the information in the first instance (for example CAO and SOLAS).

Personal data may be collected in a number of ways as follows;

- Directly from information you provide to us expressing an interest in becoming a student, and/or through the application or registration processes.
- Directly from the Central Applications Office (CAO) which processes applications for undergraduate courses in Irish Higher Education Institutions.
- Directly from SOLAS which manages the National Apprenticeship System

## 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.

We may use information collected for the following purposes;

- 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)
- Administering finance (fees, financial supports, scholarships, prizes and bursaries)
- Research and Statistical Analysis
- Safety and wellbeing of students
- To monitor and evaluate the student experience
- To enable effective communication with you

- To provide information to organisations such as the HEA 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 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
- To enable our continued contact with you after you complete your studies (e.g. survey of graduate work destinations, alumni networks, marketing, etc)
- To respond to requests for information made under data protection legislation.
- 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.

## Basis for Processing Information

The processing of personal data is necessary for the performance of the contract under which we provide services to you or to progress expressions of interest and enquiries. We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. We may also process your personal data for our compliance with our legal obligations. We may also process your personal data it is necessary to protect your or another person's vital interests; or we have your specific or, where necessary, explicit consent to do so.

## Sharing Information

The Institute may disclose student's personal data and sensitive personal data/special category data to external agencies to which it has obligations or a legitimate reason including the following;

- Higher Education Authority (HEA) – see HEA collection notice below
- Department of Social Protection
- Irish Survey of Student Engagement (ISSE)
- Quality and Qualifications Ireland (QQI)
- Student Universal Support Ireland (SUSI) for grant eligibility purposes
- Revenue Commissioners

- Professional and regulatory bodies where programmes are accredited by such bodies
- Work placement providers
- Employers 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
- Software providers or service providers performing administrative functions on behalf of CIT (e.g. IT services, clinical tools, carpark management, etc)
- CIT Students' Union to facilitate student elections
- External examiners
- United States Federal Aid Programme (where applicable)
- Direct mail agencies/printing companies to facilitate the delivery of mailshots
- Sponsors funding student prizes and awards
- Plagiarism detection service providers (e.g. Turnitin) to ensure academic standards
- Potential employers/recruitment companies for verification of qualifications
- 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

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.

## INDIVIDUAL RIGHTS

Individuals whose personal data and sensitive personal data/special category data is held by the Institute have the following rights regarding their data:

- The right to be informed
- The right to request access to their personal data held by the Institute.
- The right to rectification – to have inaccurate or incomplete personal data rectified.
- The right to erasure of personal data – this will only apply where there is no legitimate reason for the Institute to continue to process the personal data. If you exercise your right to erasure, we will retain a core set of personal data which, for alumni, will include: name, subject(s) studied, graduation details, date of birth and unique identification number so that we do not contact you inadvertently in future, and to maintain your education details for archive purposes. We may also need to retain some financial records about you
- The right to restrict the 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 provision of some elements of their information (for example academic progress details) in digital form in order to provide it to other organisations.

- The right to object – students can object to the processing of their personal data by the Institute in certain circumstances, including the sending and receipt of direct marketing material.
- The right to object to automated decision making and profiling – individuals have the right to object to decisions taken by automatic means without human intervention in some circumstances.

Where the processing of personal data or sensitive personal data/special category data is based on the consent of the student, they have the right to withdraw their consent at any time by contacting the department or service who obtained that consent or the Institute's Data Protection Officer.

If a student is unhappy with the Institute's handling of their personal data, or believes that the requirements of the Data Protection Acts or GDPR may not be fully complied with, they should contact the Institute's Data Protection Officer in the first instance. The Institute's formal complaint procedure can be invoked if appropriate, and they also have the right to submit a complaint to the Data Protection Commissioner.

## **Submission of Information to the Higher Education Authority (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.

## **What the HEA does with your data**

The HEA uses this data for fact-based statistical analysis to help understand the real 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 data from the Student Records System, information from the Equal Access Survey and information from the Graduate Outcomes Survey through student ID number and/or PPSN for more accurate statistical analysis to help improve education services and policies.

The HEA use student records to produce anonymised aggregate data in annual statistical publications.

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

The HEA shares records with other official bodies such as The Department of Education and Skills, CDETB and the Central Statistics Office for the following purposes:

### **Student Grant Application Verification**

The HEA will provide your student record to CDETB (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 to CDETB (SUSI) for the purposes of verifying data supplied 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 applicant's eligibility for grant support under the education progression requirements of the Student Grant Scheme and the Student Support Act 2011.

### **Statutory Statistical functions**

The HEA record may also be used by the Central Statistics Office in order to carry out their statutory functions of measuring population levels and monitoring public expenditure.

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

HEA student microdata is provided to the Department of Education and Skills to allow for research and analysis using this data within the Department, for instance for transition rate analysis and third level demand projections.

HEA student data (PPSN, name, address, date of birth) may be sent to the Department of Social Protection Client Identity Services to verify PPSN.

HEA administrative graduate data is linked via PPSN to Revenue administrative employment data in the Central Statistics Office to analyse graduate outcomes in terms of sector and salary etc.

Anonymised aggregate (non-personal) data to third parties.

The HEA will also 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 does not on its own 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 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 (e.g. recruitment firms, graduate employers)
- Unions
- Non-governmental organisations and charities
- Journalists

Individuals cannot be identified from this anonymised aggregate data.

## DATA RETENTION

We will hold your data indefinitely in support of your lifelong relationship with the Institute, or until you ask us to do otherwise. If you exercise your right to erasure, we will retain a core set of personal data which, for graduates, will include: name, subject(s) studied, graduation details, date of birth and unique identification number so that we do not contact you inadvertently in future, and to maintain your education details for archive purposes.

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

We will always respect a request by you to stop contact by any or all methods of communication, or for any specific purpose.



## **CONTACT DETAILS**

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer by email: [foi@cit.ie](mailto:foi@cit.ie) by telephone: +353 21 4326759; or by post: Data Protection Officer, Cork Institute of Technology, Bishopstown, Cork, T12 P928.