

Staff Data – Privacy Notice

Document Reference and Version Number	3/2021
Purpose	To ensure that all Staff are familiar with our processes in relation to the collection of personal data in line with Data Protection Legislation
Commencement Date	August 2021
Date of This Review	July 2021
Who needs to know about this document	All Staff
Revision History	Last revision - 2019
Policy Author	Information Officer
Policy Owner	Directorate of Corporate Affairs

Background

This privacy notice explains how IADT collects, uses and shares your personal data and details your rights in relation to the personal data that we hold on you. This privacy notice concerns our processing of personal data of past, current and prospective staff of the Institute.

Dun Laoghaire Institute of Art, Design & Technology (IADT) is a Data Controller. All personal data that it holds and processes is subject to the Data Protection Acts 1998, 2003 and 2018 and the EU wide General Data Protection Regulation (GDPR), which is in force with effect from 25/5/2018.

Types of Information Collected

IADT will be the Data Controller for any information held on you. The Institute may obtain, hold and process the personal data of staff including; personal details, education, training and research records, employment information, financial details, pension details, details of services provided to you. It may also obtain, hold and process special category data of staff including details of physical and mental health, racial or ethnic origin.

The following types of personal data are collected:

- Name, contact information (address, email address, telephone numbers) date of birth, PPS number, passport number (in the case of non-EU nationals), nationality and country of domicile, next of kin, photo/image
- Information relating to your education, qualifications and training records
- Information relating to your family / dependents
- Special category data to include physical or mental health, racial or ethnic origin.
- Certain criminal activities. All staff, prior to commencement of employment, are obliged to be Garda vetted as working in the Institute may bring them into contact or possible contact with children and/or vulnerable adults. The National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016 provide the statutory basis for such mandatory vetting to take place. IADT is committed to adhering to such legislation and will ensure that only suitable candidates are allowed to take up employment. Apart from the formal listed Institute programmes / duties staff are involved in, any staff who participate in or are in the vicinity of any activities that may involve unsupervised access to children / vulnerable persons will also be subject to the Institute's Vetting process.

Purpose of Collecting this Information

All the personal data the Institute collects, holds and processes on staff including special category data is in order to be able to implement and manage all services and processes relating to staff including staff recruitment and promotion, training and development, teaching and learning supports, HR, Payroll and pension administration, staff welfare. The Institute will only collect and process data that is required for these purposes. The Institute may not be able to provide these relevant services and offer a quality service without the processing of such data. This information is shared between different sections of the Institute for operational reasons as is necessary, for example between Human Resource Office and Payroll Office. The information shared is proportionate for the intended purpose.

Information collected may be used for the following purposes:

- Recruitment of staff, which includes the Vetting/approval of new (and existing) staff under the Protection of Children & Vulnerable Adults legislation via the Garda Vetting Bureau.
- Induction and further training of staff
- Academic matters – provision of support in: teaching and learning skills, assessment, examinations, research.
- Processing of grievance and disciplinary matters.
- Provision of staff cards for identification / security and access purposes
- Provision of IT services
- Provision of Library services
- Provision of staff services such as adequate access to buildings and car parks, Counselling and Advice service via the confidential Employee Assistance Programme.
- Administering finance related issues such as Staff Training Fees Assistance, payroll administration (salary payment including travel and part time teaching claims).
- Administering HR related issues such as contracts of employment, salary, maintenance of personnel details, sick and annual leave, pension administration, protective Leave, Flexible working schemes etc.
- Research and statistical analysis
- Monitor and evaluate the staff experience to enhance services further and enable effective communication with our staff both current and past.
- To provide data to organisations such as the HEA (Higher Education Authority), Revenue etc. in line with legal and government requirements.
- To comply with statutory reporting requirements.
- To administer voluntary surveys of staff opinion about your experience and the performance of the Institute as required from time to time.
- To create and publish printed and soft copy materials such as reviews, reports, prospectus, brochures, website for promotional and archive purposes.
- To assist with law enforcement or where required as authorised by law.
- To confirm the details of your academic achievements and employment, and for statistical and historical purposes. A core record of your employment is retained indefinitely on the Human Resources/Payroll information system, CORE HR.
- To enable the Institute to continue to contact you after you retire or leave employment for example for alumni news, marketing etc.
- To respond to requests for information made under data protection legislation.
- To assist joining other third level or professional organisations who may require confirmation of your data such as date of birth or confirmation of job title/employment. To facilitate any new employer with confirmation of your employment (references for example) and possibly pension entitlement and salary confirmation if transferring to another third level education provider.
- To comply with financial legislation to issue an actuarial valuation of our Superannuation schemes.

How we collect your Information

The majority of the personal data the Institute holds and processes relating to staff is obtained directly from the staff member or applicant in a recruitment campaign or for example as a member of Governing Body, external examiner, interview panel member etc. IADT also gathers information from third parties such as references as well as health information from the pre-employment medical. In the case of employees who have previously worked in the public service, we also request and hold details of previous service, transfer of service records and

pension, sick leave and parental leave records.

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

- The information you supply to us when you express an interest in becoming a staff member (application process via provision of CVs or application forms, either hard copy or soft copy on the electronic recruitment portal CORE HR/Recruitment.)
- Information you supply to the Institute as a staff member on an ongoing basis for maintenance of your individual CORE HR profile, for example, next of kin, dependents details, sick leave data.

Basis for Processing Information - What We Do with Your Information

The processing of personal data is necessary to allow us to perform our duties as part of the contract of employment with you and also to provide services to you or to allow us to follow up on expressions of interest and enquiries. Our staff in IADT process all the personal data we hold, however for the purposes of IT operations, the hosting and maintenance of some staff data is held on a computerised personnel/payroll system called CORE HR. The server holding this data is monitored by our IT Services team and our HR and Payroll staff but also is serviced and maintained by an external provider working in conjunction with the Institute. We have a strict regime in place to oversee the effective and secure processing of your personal data. You can gain more information on this IT framework by accessing the Institute website section on IT Policies and Procedures.

The Athena Swan Charter

The Athena Swan Charter recognises and celebrates good practice in recruiting, retaining and promoting women in science, technology, engineering, maths and medicine (STEMM) in higher education. The Charter aims to address gender imbalances in STEMM disciplines, based on the belief that endeavours in these fields will be enriched when they can benefit from the talent of the whole population, and when barriers to progress in academic careers are removed.

In accordance with the provisions of the HEA requirement for Higher Education Institutions to engage with the AthenaSwan process, we collect and utilize personal data in an aggregated, anonymised and statistical form for inclusion in our applications. The legal basis for this collection and processing of this data is for the legitimate interests of IADT.

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

- Higher Education Authority (HEA)
- Department of Education and Skills
- Department of Enterprise Trade and Innovation
- Department of Public Expenditure and Reform
- Department of Social Protection for PPS number verification
- Revenue for tax purposes.
- Advance HE for AthenaSwan
- There is a new requirement for IADT to provide an actuarial valuation of our Superannuation schemes. The firm of Crowleys DFK have been appointed, through a sectoral Procurement process, to provide this information. We therefore will share Superannuation data (under a Data Processing Agreement) with this firm under both a legal and contractual basis.
- Where necessary professional bodies who accredit programmes of study in IADT

- Other higher education organisations, partners, or research organisations to which a staff member might transfer or undertake a programme of study or research collaboration.
- Software and service providers performing administrative duties on behalf of IADT such as IT services provision, management of car park and so on.
- Printing companies and agencies who facilitate the printing and delivery of mailshots and Institute publications for marketing purposes.
- Potential employers and recruitment agencies who wish to verify IADT employment history of former staff as part of their recruitment process.
- Insurance companies in regard to accidents occurring on Institute property
- Legal advisors to the Institute.
- Án Garda Síochána to assist in the prevention or detection of criminal activity.
- Internal Auditing companies and Office of Comptroller and Auditor General.

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

What are your rights as an Individual?

Staff/individuals whose personal data including special category personal data is held by IADT have the following rights regarding their own data:

- The right to be informed
- The right to request access to their personal data held by IADT
- The right to rectification – to have any inaccurate or incomplete personal data rectified.
- The right to erasure of personal data. This will only arise where there is no legitimate reason for the Institute to continue to process the personal data. If you exercise your right to erasure IADT will retain a set of core personal data which for former staff will include, name, date of birth, job title, employee ID number, pension details (if appropriate). These will be kept to maintain your IADT employment details for archive purposes. It may be necessary to also retain some financial records about you for reporting and audit purposes. It will be necessary to note your wish for erasure so that we do not inadvertently contact you in future.
- The right to restrict processing of personal data. Individuals have the right to block the processing of their personal data by the Institute in specific situations.
- The right to data portability. Staff have the right to request the provision of some elements of their information in digital form in order to provide it to other organisations (for example their pension data).
- The right to object. You can object to the processing of your personal data by IADT in certain circumstances including the sending and receipt of direct marketing material.
- The right to object to automated decision making and profiling. You have the right to object to decision taken by automatic methods without a human intervention in some circumstances.

Where the processing of personal data or special category personal data is based on the consent of the staff member, you have the right to withdraw that consent at any time. To do this you should contact the department or service who obtained your consent originally, presenting with photo identification.

As a staff member, if you are unhappy with the Institute's handling of your personal data or believe that the requirements of the data protection legislation are not being complied with, you should contact the Institute's Data Protection Office in the first instance by email to dp@iadt.ie. Additionally, the Institute's formal complaint procedure can be invoked if appropriate and you also can submit a complaint to the Office of the Data Protection Commissioner. Please see this link for further details <https://www.iadt.ie/about/your-rights-entitlements/gdpr>.

Data Retention

IADT will hold some of your data indefinitely to assist with your lifelong relationship with the Institute. All records retained by the Institute are held in accordance with the Institute's Records Management Schedule and Data Protection legislation.

Under the terms of the Data Sharing Agreement with Advance HE, they will keep a record of the data for up to 8 years, after which period the personal data may be further anonymised and aggregated to enable Advance HE to use the IADT data as part of ongoing impact evaluation and sector research.

Data Subjects relevant to Athena Swan

Student Related

Applicants to study (All entry routes)

Students (including visiting (Erasmus and all other International) and dormant)

Graduates and Former Students (Withdrawals, Deferrals, Excludeds etc)

Staff Related

Applicants to work

Staff (including associate and honorary)

Former staff (Retirees, Resignees etc)

General

Visitors where we collect personal data (including conference and event speakers and attendees),

Categories of Personal Data:

- Personal details: name, job title, employer;
- Photographs;
- Education and training records;
- Employment and progression details;
- Information pertaining to family and private lives;
- Application outcomes;
- Enrolment;
- Awards and honoraria (nominations and receipt);
- Contract type and mode;
- Leave;
- Information pertaining to experiences and perceptions; and
- Disciplinary and grievance procedures.

The following types of Special Categories of Personal Data may have been included:

- Racial or ethnic origin;
- Data concerning a natural person's sexual orientation;
- Religious/philosophical beliefs;

- Trade Union membership;
- Health.

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

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

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

Collection and Sharing Data with other Government Departments

IADT may send some of the information we hold about you to the following Departments who have a function to fulfil under Irish Higher Education provision.

- Department of Education and Skills
- Higher Education Authority (HEA)
- Department of Enterprise Trade and Innovation
- Department of Social Protection
- Central Statistics Office

Athena Swan Charter

As part of the application process for Athena Swan accreditation and awards we transfer personal data in an aggregated, anonymized and statistical form to Advance HE under the terms of the Data Sharing Agreement. Under this Agreement Advance HE will share this data with appointed evaluators in their process. Any further sharing of the data by Advance HE will only be permitted by agreement with IADT.

What do these organisations further do with your data in more detail?

The data sent to these departments which, for the most part, is anonymised and statistical, is used for fact based statistical analysis to help understand the needs that higher education should meet, to promote equality of opportunity in higher education and to assist the government in developing future higher education policies and investment. This occurs by linking this information to information gained from a variety of other sources including that also from the HEA Student record, Equal Access Surveys, Graduate Outcomes Survey etc., for more accurate statistical analysis to help improve education services and policies.

Statutory Statistical Functions: Central Statistics Office

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

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

Staff data is provided to the Department of Education and Skills to allow them carry out research and analysis using this data within the Department for example to look at and analyse third level demand projections.

Staff data such as PPSN, name, address, date of birth may be sent to the Department of Social Protection Client Identify Services to verify PPSN and verify sick leave social welfare claims (where appropriate)

Anonymised aggregate non-personal data to third parties

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

Equal Opportunities Monitoring – a staff 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 IADT to the following types of user:

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

Individuals cannot be identified from anonymised aggregate data.

How to contact us at IADT

IADT is a data controller in respect of staff personal and special category personal data. Please contact us if you have any questions about the information we hold about you or to request access to or a copy of that information. This is called a data subject access request.

- By email: dataprotection@iadt.ie
- In writing: Information Officer, IADT, Kill Avenue, Dun Laoghaire, Co Dublin.
- By telephone: 01 239 4947 or c/o 01 239 4619