

Institute of Technology Tallaght

Data Protection Policy



Rev 5 - May 2014

Introduction

ITT Dublin (Institute of Technology Tallaght) is registered as a Data Controller under the Data Protection Acts 1988 and 2003. The Institute complies with the requirements of the Data Protection Acts, 1988 and 2003 with regard to the collection, storage, processing and disclosure of personal information and is committed to upholding the Act's core Data Protection Principles. The Institute's Data Controller is the Secretary/Financial Controller.

We regard the lawful and correct treatment of personal information by the Institute as very important to successful operations and for maintaining confidence between ourselves and those with whom we deal. We therefore make every effort to ensure that personal information is treated lawfully and correctly.

Purpose of this policy

This policy is a statement of ITT Dublin's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

Definition of Personal Data

Personal data, in both automated and manual form, is data relating to a living individual who is or can be identified, either from the data or from the data in conjunction with other information that is in, or is likely to come into the possession of ITT Dublin.

ITT Dublin needs to collect a range of personal information in order to operate. This includes personal information of current and past students; current, past and prospective employees, suppliers, clients/customers, and others with whom it communicates. The Institute requires this information to support the administration of contracts with these people and, in addition, it may occasionally be required by law to collect and use information of this kind to comply with the requirements of Government Departments for business data, for example. This personal information must be dealt with properly however it is collected, recorded and used - whether on paper, in a computer, or recorded on other material - and there are safeguards to ensure this in the Data Protection Acts, 1988 and 2003.

Data Protection Principles

ITT Dublin fully endorses and adheres to the **Principles of Data Protection**, as detailed in the Data Protection Acts, 1988 and 2003.

Specifically, the **Principles** require that personal information (both automated and manual data):

- (a) shall be obtained and processed fairly;
- (b) **The Institute should inform students, on our official application forms, of how the information they provide will be used. The Institute should also display a notice with such explanations in the reception area.**
- (c) shall be kept only for one or more specified and lawful purposes;
- (d) shall not be used or disclosed in any manner incompatible with that purpose or those purposes;
- (e) shall be kept safe and secure;

- (f) shall be accurate and kept up-to-date;
- (g) shall be adequate, relevant and not excessive;
- (h) shall not be retained for longer than is necessary for the purpose or purposes;
- (i) shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

and that:

- (i) appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Therefore, ITT Dublin will, through appropriate management, and application of criteria and controls:

- observe fully conditions regarding the fair collection and use of information: meet its legal obligations to specify the purposes for which information is used; collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure the quality of information used;
- apply strict checks to determine the length of time the information is held;
- ensure that the rights of people about whom information is held can be fully exercised under the Acts. (These include: the right to be informed that processing is being undertaken: the right of access to one's personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is regarded as the wrong information.);
- take appropriate technical and organisational security measures to safeguard personal information;
- ensure that personal information is not transferred abroad without suitable safeguards.

In addition, ITT Dublin will ensure that:

- there is someone with specific responsibility for data protection in the organisation. (the Data Controller);
- everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- everyone managing and handling personal information is appropriately trained to do so;
- any third party organisation that processes data on our behalf has adequate measures in place and provides us with written guarantees to this effect;
- queries about handling personal information are promptly and courteously dealt with;
- methods of handling personal information are clearly described;
- a regular review and assessment is made of the way personal information is managed;

Anybody wanting to make enquiries about handling personal information should contact the Information Officer foi@ittdublin.ie in the first instance.

The Institute expects all employees with access to personal information to respect the need for confidentiality and to avoid improper use or transfer of such information. Any employee, who fails to adhere to these principles, may be subject to disciplinary action.

CCTV

ITT has 70 CCTV cameras located throughout the Institute which covers corridors, staircases and other public areas. The images captured on these cameras are digitally recorded and stored in a secure facility. While CCTV footage is monitored by the Institute's caretakers and security staff, the Estates Manager and technical advisor, it is not disclosed to any third party except An Garda Síochána in the case of a disclosure pursuant to Section 8 of the Acts, which may be required for the purpose of preventing, detecting or investigating offences.

How to make an Access Request:

Under Section 4 of the Data Protection Acts, an individual has the right to request a copy of certain information relating to them which is kept on computer or in a structured manual filing system by any person in the Institute.

A request under section 4 must be in writing, should be addressed to the Data Compliance Officer (Information Officer) and should include any additional details that may be necessary to enable the Institute to locate the requested record; e.g. staff number or student number. A fee may be charged, but this cannot exceed €6.35. Once a request is made, and appropriate fees paid, the request will be considered and a response will be provided to the requester within 40 days.

Section 4(6) of the Acts sets out the restrictions regarding the right to obtain access to examination results.

Review

This Policy will be reviewed regularly in light of any legislative or other relevant developments.

Last updated: November 2014