



# **Record of Processing Activities under GDPR Article 30**

## Document Location

Data Protection Officer, Technological University Dublin

## Revision History

<b>Date of this revision: February 2020</b>	<b>Date of next review: February 2021</b>
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<b>Version No. / Revision No.</b>	<b>Revision Date</b>	<b>Summary of Changes</b>
Draft	August 2019	
1.0	February 2020	

## Consultation History

<b>Revision Number</b>	<b>Consultation Date</b>	<b>Names of Parties in Consultation</b>	<b>Summary of Changes</b>
		TU Dublin Compliance Group	

## Approval

This document requires the following approvals:

<b>Name</b>	<b>Title</b>	<b>Date</b>
Denis Murphy	Chief Operations Officer	
David FitzPatrick	President	

**This Policy shall be reviewed and, as necessary, amended by the University annually. All amendments shall be recorded on the revision history section above.**

## 1. Data Controller Details

**Name:** Technological University Dublin (TU Dublin)

**Address:** Park House Grangegorman, 191 North Circular Road, Dublin 7, D07 EWW4

**Telephone Number:** +353 1 2205264

**Websites:** <https://tudublin.ie/>

### Joint controllers:

In certain circumstances, TU Dublin enters into a Joint and Separate Controller relationship including with:

- Central Admissions Office (CAO)
- Higher Education Authority (HEA)
- An tSeirbhís Oideachais Leanúnaigh agus Scileanana (SOLAS)
- Quality and Qualifications Ireland (QQI)

Additional joint and separate controller arrangements occur with partners on specific projects, documented in contracts, agreements, or as part of research consent statements.

### Data Protection Officer:

**Name:** Catherine Bruen

**Email:** [dataprotection@TUDublin.ie](mailto:dataprotection@TUDublin.ie)

**Website:** <https://tudublin.ie/explore/gdpr/>

**Address:** TU Dublin, Tallaght, D24 FKT9

**Telephone Number:** +353 1404 2130

## 2. Categories of Data Subjects

TU Dublin collects personal data from the following categories of data subjects:

- Students; including those availing of student health or counselling services
- Current Employees, prospective employees, former employees
- Former students (also referred to as 'Alumni') and Donors
- Researchers and research subjects, authors, publishers and other creators of content and academic materials
- External Examiners
- Parents and guardians providing funding, consent on behalf of minors, or who or are given as contacts when TU Dublin provides services, information or facilities to an individual

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- Family members – children\dependants in cases of parental leave applications and for applications for Student Assistance Funding
- HR Recruitment panel members
- Professional Advisors, Consultants and Contractors, Creditors
- University Governing Body and Committee members
- Academic Programme Members
- Members of public including visitors or those using Sports infrastructure, services or facilities
- Tenants of Business Start Up companies
- CCTV images
- Optometry Service Users

More rarely, and on case-by-case basis, additional processing may take place involving following categories of data subjects -

- Subjects involved in complaints or investigations by regulatory or law enforcement authorities, including CCTV footage of particular events or data processed through security systems
- Individuals involved in any accidents or incidents including involvement of Emergency Services
- Details of persons involved in or affected by data incidents (which may contain personal data)
- Persons involved in legal or insurance claims involving TU Dublin

### **3. Categories of Personal Data**

TU Dublin collects the following categories of personal data:

#### **3.1 Relating to Human Resources (HR) Functions**

- Details of Candidates not qualified or shortlisted
- Unsuccessful Candidates who are Shortlisted or called for Interview
- Applications and CVs of Candidates who are called for interview
- Interview Evaluation Sheet
- Interview Board Interview Notes
- Selection Board Report and other Interview Documentation
- Application/CV of successful candidate
- Pre-Employment medical reports
- Employment Contract
- Probation forms
- Leave Records (paid and unpaid)
- Time & Attendance Records
- Employee Assistance Programme
- Personal Development forms
- HR team development forms

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- Superannuation / Pension/Retirement records
- Copy of birth certificate/Passport
- Unpaid Absence records
- Pensionable Service with TU Dublin
- Transferred Service
- Purchased Service i.e. Notional Service
- Professional Added Years Applications
- Pre entry / transferred service information
- Pension Sheets
- Superannuation Register
- Case Management Files
- Records re. staff created by Centre Managers and where HR do not have the originals – Formal Meeting with Staff

Special categories of personal data may be included in the following:

- Health data for purposes of disability support/employment purposes and/or occupational health.
- Grievance, disciplinary, fitness to practice or HR attendance record data.
- Performance information
- Offences and alleged offences
- Information on Criminal conviction for vetting purposes
- Racial or ethnic origins
- Trade union membership
- Visa and immigration details

For purposes of equality, inclusion and diversity:

- Gender
- Gender Identity
- Age
- Nationality
- Disability
- Racial origin/ethnicity
- Civil Status

### **3.2 Relating to Academic Affairs, Colleges and Schools and Research functions**

#### 3.2.1 Academic and Colleges

- Election of staff representations to College Boards – results published and elected members included in membership of College Board for the nominated period
- Academic files (may contain records such as placement records, references, medical/sick certs etc.)
- Student disciplinary (where a minor offence is deemed to have taken place)
- Student disciplinary (where an offence is deemed not to have taken place)

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- Incident Report Forms / Hazard Report Forms
- PMDS (Personal Development Plans)
- Records where HR have official files (e.g. copy appointment letters, HPAL Appointment Forms)
- Records where college/school has formal records of meetings with staff
- Correspondence with External Examiners
- Panel of Enquiry – all documents including correspondence from examinations office, correspondence to students, Panel of Enquiry decisions and all documentation relating to appeals of decisions
- Appeal of examination results
- Appeal of results (re-check or re-mark)
- Application to withdraw or defer with reference to a programme of study
- Continuous Assessments
- Pre-Examination Board Reports, including data re internal/external repeats
- Programme Application Forms

### 3.2.2 Research

- Post Graduate Research Forms (Application and Registration Forms, Annual Evaluation Forms, (yearly results), Transfer and Confirmation Exam Forms (midpoint results), Nomination of Examiners Forms, Examination Report Forms (final results).
- Postgraduate Research Student Records other than PGR Forms (Formal and/or informal correspondence with or related to research students.
- Assignments
- CPD Postgraduate in New Business Development Deliverers Forms (NDA for Programme Facilitators)
- CPD Postgraduate in New Business Development Students Forms (Application and Registration Forms, Participate Agreement Forms, Enterprise Ireland CORD grant application forms and CORD grand claims, mentor application forms.)
- CPD Postgraduate in New Business Development Student Records (Formal and / or informal correspondence with or related to students to the programme)
- Invention disclosures
- Patents
- Deed of Waiver (Legal documents where the inventor (s) have decided to forgo future revenues arising from any commercial agreement for their intellectual property.

Reports for funding and governance bodies such as the Higher Education Authority.

For purposes of equality, inclusion and diversity:

- Gender
- Gender Identity
- Age
- Nationality
- Disability

### **3.3 Relating to Service Provisions including Estates and ICT**

- ICT Domain accounts for staff & student and user-generated content on home folders located on TU Dublin storage area networks (SAN) on the Campuses
- Google G-Suite and Office 365 accounts for staff & student and user-generated content on personally assigned home folders
- Data backup operations (email)
- Monitoring logs - RMS
- Support requests
- CCTV and Printing

### **3.4 Relating to contractual and financial functions e.g. administering payments/fees/research funding:**

- Financial details of individuals both Creditors and Debtors of TU Dublin
- Staff Bank Details
- ROS (Revenue Commissioners) tax information for employees
- Social Welfare information for employees
- Staff Pay Claims
- Travel and Subsistence Claims (staff, students, external examiners, panel board members etc.)
- Tuition Fee Assessment Forms
- Online Payment Platform for Student Tuition and other charges
- SUSI Grants- Attendance and Registration Status of Students
- Student Assistance Fund – Bank Details for payment under this scheme
- B891 Form (details of payments made to Creditors) to Revenue Commissioners.

Special Categories of personal information may be included as follows:

- Medical Data for Student Assistance Fund Assessments
- Racial or ethnic origins (from Photo ID)
- Visa and immigration details (Research stipend payments)

### **3.5 Relating to compliance; prevention and detection of crime, safety, security, accident/ incident management and legal/insurance claims**

- Professional Advice & Related Correspondence – Professional advice and briefings/ correspondence on employment and public liability matters
- Insurance –Insurance Claims by staff/student/member of the public.
- TU Dublin Governing Body Meeting Records – Agendas, minutes, tabled documents, Reports, Attendance Sheets, Correspondence to/from GB etc.
- Standards in Public Office (SIPO) Records – Annual SIPO Returns-Statements of Interest.
- External Work Declarations.



#### **4. Purposes of Data Processing**

TU Dublin obtains, processes, collects, keeps, uses, discloses (where permissible by law), and retains Personal Data and/or Special Categories of Personal Data regarding its staff, students, prospective students, service users and other individuals who come in contact with, avail of the services of or engage in business with the University. While the processes may vary slightly from one TU Dublin Campus to another, all Campuses are in line with this Record of Processing Activities.

The purpose of processing Personal Data and Special Categories of Personal Data include but are not limited to:

- fulfilling the University's functions and obligations under the Technological Universities Act 2018 and TU Dublin policies and procedures,
- the provision of educational courses and support services to prospective students, students and staff,
- assessment of student learning and engagement,
- the organisation and administration of courses,
- undertaking of research activities,
- the recruitment and employment of staff,
- compliance with statutory obligations,
- reporting to Government and regulatory bodies,
- the provision of commercial activities,
- the management of financial affairs,
- the provision of information solutions and services,
- the provision of library services,
- advertising and promoting the University,
- publishing University and alumni publications and
- undertaking fundraising by or on behalf of the University.

The University also processes personal information through CCTV systems that monitor and collect visual images for the purposes of security and the prevention and detection of crime and offences.

These activities are carried out on behalf of TU Dublin by its functional areas. In some cases, more details are available through functional area records of processing activity and/or Data Protection Notices.

#### **5. Categories of Personal Data Recipients**

Information relating to students and/or staff is sent to: [QUERY 'is']

- the Department of Education and Skills (DoES), the Department of Public Expenditure and Reform (DPER), the Department of Social Protection, the Higher Education Authority (HEA), Quality and Qualifications Ireland (QQI), Central Application Office (CAO), Student Universal Support Ireland (SUSI), the Revenue Commissioners, or other regulatory bodies, where required to do so.

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- Interview Assessment Boards
- Governing Body Members
- Referees
- Line Managers; HR
- Pension Scheme Administrators for operation of pensions relating to employees.
- Nominated Occupational Health Provider:
- Garda Vetting services
- Colleges and Schools External Examiners
- Transfer of leave and pension records for staff who are taking up new employment outside TU Dublin (if requested by the employee)
- Transfer of leave and pension records for staff who are taking up new employment outside TU Dublin (if requested by Employee)
- Educational Collaborators (National and International)
- Research Funding Bodies
- IT and Other Service providers who act as our processors when carrying out University functions.
- Banks to facilitate EFT transfers
- Transfer of medical records of students (at their request) as part of their treatment plan with the Counselling/Medical services of TU Dublin
- The organisers of conferring ceremonies where graduate status or other award is publicly acknowledged
- Debt collection agencies where necessary, because of outstanding fees or other charges
- TU Dublin Students' Union for the purposes of Union membership, representation and elections
- Sport Clubs and Societies to manage access to membership, services and facilities
- The Graduate Network (Alumni) to facilitate future contact between alumni, TU Dublin and fellow alumni e.g. university mailings, events, reunions and university related fundraising activities.
- Researchers who are working in collaboration with TU Dublin, including cross-institutional research projects in the SFI funding framework
- HEA and Departments of Education and Skills and Public Expenditure and Reform
- Insurance, legal advisors, third party investigators, Workplace Relation Commission
- Department of Social Protection
- Transfer of leave records to new employer
- Online application for Tax Saver incentive scheme
- Ombudsman, Office of the Information Commissioner, Office of the Data Protection Commissioner, Workplace Relations Commission, legal advisors, third party investigators
- HEA
- Department of Education and Skills
- Department of Public Expenditure and Reform
- Revenue Commissioners
- Comptroller and Auditor General
- Internal Auditors
- Research Funding Auditors
- European Community Auditors
- Banks (re EFT File Transfers)

- SUSI

This is not an exhaustive list and other disclosures to third parties not listed here are made only where we consider it is lawful to do so.

### **European Economic Area / Overseas**

For those employees or students who are involved with one of our overseas partners, or who have funding sponsors or guarantors, or other nominated contacts, who are based outside of the EEA or those who are working or studying with entities belonging to the TU Dublin group or partners of TU Dublin based outside the EEA, some information may be transferred to those other locations.

Transfers outside the EEA may take place in relating to operation of the above and in particular involving: Student and teaching employee posts and placements, administrative/payroll services provided by TU Dublin, research collaborations, Alumni International Events, Erasmus, Study Abroad, Software Solutions, Cloud Hosting Solutions, Survey Solutions; Externs on a Board of Assessors who are based abroad beyond the EEA, Institutions based abroad, Employees on sabbatical abroad, or Faculty Promotion board members who are based abroad beyond the EEA

Where personal data are transferred to partners outside the EEA TU Dublin will put in place Data Processing Agreements, using the Standard Contractual Clauses as approved by the European Commission, and take steps to ensure that appropriate security and privacy measures are taken with the aim of making sure that data subject privacy rights continue to be protected.

### **6. Personal Data Retention Periods**

Except as otherwise permitted or required by applicable law or regulation, TU Dublin aims to retain personal data for only as long as is necessary to fulfil the purposes TU Dublin collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, TU Dublin will consider the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

### **7. Technical and Organisational Security Measures**

Security and compliance measures taken by TU Dublin functions include those listed in the links below:

<http://www.dit.ie/institutesecretarysoffice/informationgovernance/dataprotectionincludingrecordsmanagement/>

<https://www.it-tallaght.ie/ict-policies>

<https://www.itb.ie/AboutITB/Compliance.html>

<https://www.dit.ie/aadIt/ictservices/security/itsecuritypolicies/>

There is a GDPR Steering Group on each TU Dublin Campus which meet regularly to review compliance and awareness matters, and progress the implementation of the GDPR Project which includes reviewing of Data Life Cycles and ensuring robust Data Protection Impact Assessments.

#### **8. Changes to this document**

TU Dublin reserves the right to amend this record of processing activity from time to time consistent with the GDPR and other applicable data protection requirements and to reflect changes in the organisation over time.