

Chapter 7. Information and Communication Management

This chapter relates to the following Quality Assurance guidelines from Barrow Training's accrediting bodies:

- Information and Data Management (QQI Core Statutory Quality Assurance Guideline 8)
- Public Information and Communication (QQI Core Statutory Quality Assurance Guideline 9)
- Organisational Structure and Management (PHECC Quality Assurance Theme 1)

Barrow Training is committed to reviewing, maintaining and continuously enhancing its knowledge-based information system to allow for the collection, analysis and use of relevant information to ensure effective management support and development of its programmes and other activities. Critical quality indicators are maintained and reviewed on an ongoing basis and used to inform continuous improvement within the organisation.

7.1 Information Management System

Barrow Training implement a customised Information Management System (IMS) called VERI. The Training Manager has full access to this system, while administrative and academic staff have limited access. The system, which was implemented in 2016, is updated on a regular basis and provides an excellent data repository and reporting function for all organisational activity.

The system is monitored through day-to-day use and various other forums such as IT meetings, staff meetings as well as a systematic QA audit process. Identified improvements and necessary updates are carried out in a timely manner by VERI development team.

7.2 Data Collection and Sources

Barrow Training collect and hold a wide range of data which is captured within our IMS, the NAS (network-attached storage) system and the emails systems. These can be used for relevant analysis and reporting within all functional areas. The data which is captured can be organised into the following 5 categories.

- a) Personal data (tutors, learners and staff – queries, learner admission and assessment information)
- b) Programme-specific
- c) Assessment
- d) Financial and operational
- e) Learner, tutor and client feedback

Data is collected through various methods such as booking forms, enquiry forms, telephone conversations, emails, LiveChat, CVs, registration forms and other appropriate means. Mailchimp is also utilised when necessary.

Information is stored on Barrow Training's internal administration system for seven years, at which point it is deleted. Hard copies of information collected is destroyed after one year.

7.3 Backups and Disaster Recovery

Barrow Training's backup system is managed by a local external IT Support company.

Business IT Solutions, 16 Hebron Business Park,
Hebron Road, Kilkenny

(056) 778 6882 support@bits.ie



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Barrow Training servers are protected from physical and electronic attack. The security and retention of learner data is paramount, and a multi-layer back-up policy and data processing agreement are in place. All files are backed up twice a day to secure cloud storage. Barrow Training monitor these daily backups by the support dashboard and can respond immediately to any abnormal events.

The system is designed to handle hardware failure on any individual server with minimum disruption to learners and faculty. Load balances automatically manage the network traffic in the event of a server failure, in many cases without interruption to the learners' online experience.

In case of an emergency where it is not possible to gain access to Barrow Training's physical office, e.g. red weather warning, the Director of Training and the Project Manager can access the NAS drive remotely. This will ensure that the company can operate on a temporary basis.

7.4 Policy & Procedure for Data Protection (QF654)

7.4.1 Introduction

This policy is a statement of Barrow Consultancy & Training Ltd.'s (hereafter Barrow Training) commitment to protect the rights and privacy of individuals in accordance with Data Protection Law.

Barrow Training may have to collect and use information about people with whom we work. These may include current, past, and prospective employees, learners, clients, and suppliers. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

Barrow Training regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom Barrow Training carry out business. Barrow Training will ensure that we treat personal information lawfully and correctly.

To this end Barrow Training fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR) which confers rights on individuals as well as responsibilities on those persons processing personal data.

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with its human resources function as described below. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of job applicants, existing and former employees, learners, placement students, workers and self-employed contractors. These are referred to in this policy as data subjects.

7.4.2 Definitions

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual’s health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual’s criminal convictions and offences.

“Data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

7.4.3 Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, Barrow Training will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) Barrow Training will comply with the relevant GDPR procedures for international transferring of personal data

7.4.4 Types of Data Held

Employees

Barrow Training keep several categories of personal data on our employees in order to carry out effective and efficient processes. Barrow Training keep this data in a personnel file relating to each employee and we also hold the data within our encrypted and password-protected computer systems, for example, our holiday booking system.

Specifically, Barrow Training hold the following types of data:

- a) personal details such as name, address, phone numbers
- b) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education and employment history etc
- c) details relating to pay administration such as PPS numbers, bank account details and tax codes
- d) medical or health information
- e) information relating to your employment with us, including:
 - i) job title and job descriptions
 - ii) your salary
 - iii) your wider terms and conditions of employment

- iv) details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
- v) internal and external training modules undertaken

Learners

Learner data is mainly obtained from the details you provide directly through the application/enrolment/registration process, or which your manager/supervisor provides, as well as your academic information, e.g. results, certification.

This is held by Barrow Training on its records systems including encrypted and password-protected Excel spreadsheets and the Veri Learner Management System. Learners engaged in Blended Learning will also have their name and email address stored on the Enovation Learner Management System.

Categories of personal data collected/recorded include:

- a) Name
- b) Postal and email addresses
- c) Phone number
- d) Date of birth
- e) Gender
- f) PPS Number
- g) Next of kin/emergency contact details
- h) Financial information (including details of funding and fees paid and outstanding)
- i) Image (for online platform) and proof of identification where necessary
- j) Garda vetting record
- k) Engagement with Barrow Training's virtual learning environment activity
- l) Information about examinations, assessments and results, repeat examinations and learner progression
- m) Certificates awarded
- n) Details of disabilities (optional) and/or medical records (may be necessary in application for reasonable accommodation)
- o) Disciplinary, grievance procedures data
- p) IP address, and the type of device you are using when visiting the Barrow Training website on a mobile device

7.4.5 Rights of Data Subjects

Your rights relating to your personal data include:

- a) to be informed (via a privacy notice and other communications)
- b) to request access to Personal Data held by Barrow Training, and to have any incorrect Personal Data rectified
- c) where appropriate, to the restriction of processing concerning you or to object to processing
- d) to have Personal Data erased, where appropriate
- e) to data portability regarding certain automated Personal Data
- f) with regard to rights within the legislation relating to "automated decision-making", Barrow Training does not use such processes and they do not arise
- g) to restrict the use of the data Barrow Training hold and the right to object to Barrow Training using your data – please contact the Data Protection Officer if you believe your personal data is being used unlawfully or you have reason particular to your personal situation why Barrow Training should not be processing it.

Requests for any of the above should be addressed by email to info@barrowtraining.ie or in writing setting out your specific request to Barrow Training's Data Protection Officer, Barrow

Training, High Street, Bagenalstown, Co. Carlow, R21 TH22. Your request will be processed within 30 days of receipt. Please note, however, it may not be possible to facilitate all requests, for example, where Barrow Training is required by law to collect and process certain personal data including that personal information that is required of any learner of Barrow Training.

Additionally, you can update your personal data by contacting the Training Manager at admin@barrowtraining.ie.

7.4.6 Responsibilities of Employees

In order to protect the personal data of data subjects, which it holds or to which it has access, Barrow Training have designated employees with specific responsibilities for the processing and controlling of data.

Barrow Training have also appointed employees with responsibility for reviewing and auditing our data protection systems.

7.4.7 Responsibilities of Data Subjects

1. *Updating your details:* The GDPR requires that personal data is accurate. Please let Barrow Training know if your contact details change. If Barrow Training do not have the correct contact details, we cannot take responsibility if we are unable to provide you with any information you require, for example, missing an exam or deadline resulting in serious consequences.
2. *Processing Personal Data:* You must comply with Barrow Training's Data Protection Policy and the GDPR if, as a learner, you have access to the personal data of others; or if you wish to collect or process any personal data as part of your studies or research. You must ensure that you notify and seek approval from your tutor before any processing occurs. If you are processing personal data other than as part of your studies, you should contact the Office of the Data Protection Commissioner (Supervisory Authority) as you will not be covered under Barrow Training's registration. You can contact that Office at info@dataprotection.ie or by writing to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

7.4.8 Lawful Bases of Processing

Data Protection law requires that Barrow Training must have a valid lawful basis in order to process personal data. Barrow Training relies on a number of such bases as follows:

1. *The provision of a contract* – much of the personal information Barrow Training processes is necessary to meet its commitments to you, for example, processing your data in relation to teaching, assessment and associated administration. The following sets out the main purposes of which we process learners' personal data in the provision of a contract:
 - Recruitment and admission of learners
 - Provision of teaching and associated academic services including examinations, progression and related administration
 - Facilitating accreditation with professional and industrial bodies
 - Managing and administering learners' educational contracts
 - Recording and managing learner conduct (including disciplinary procedures)
 - Maintaining learner records
 - Management and administration of learner finance (including fees and funding)
 - Graduation – type and status of graduate awards are publicly acknowledged at Barrow Training conferring ceremonies and are published in Barrow Training's

conferring booklet; Graduation ceremonies are regarded as public events and may be recorded and/or live streamed by Barrow Training.

- Delivering plagiarism checking and academic validation services
- Providing services necessary for the learner experience (including IT and communication services)
- Providing support and maintenance services (including IT)
- Safeguarding and promoting welfare of learners
- Dealing with grievances and disciplinary actions
- Dealing with complaints and enquiries
- Providing careers and placement advice and services
- Service improvement via feedback and surveys
- Internal reporting and record keeping
- Responding to data access requests you make
- Inclusion in Barrow Training's Outlook directory
- Providing learner support services including:
 - Disability and learning support services
 - Careers and employment advice and services
 - Health and wellbeing services
 - Barrow Training email distribution lists: as a registered learner you will automatically be added to a number of email distribution lists to enable Barrow Training to manage its operations and provide the full range of services to you. An opt-out option is not permitted for these operations and core services.

The following sets out the main purposes of which we process employees' personal data in the provision of a contract:

- Contact details such as name, address, phone numbers
- Information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education and employment history etc
- Details relating to pay administration such as PPS numbers, bank account details and tax codes
- Medical or health information
- Information relating to your employment with us, including:
 - job title and job descriptions
 - your salary
 - your wider terms and conditions of employment
 - details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
 - internal and external training modules undertaken

2. *The fulfilment of a legal obligation* – Barrow Training must process your personal data when required to do so under Irish/EU law, for instance:

- Sharing information with statutory bodies
- Monitoring equal opportunities
- Providing safety and operational information
- Performing audits
- Preventing and detecting crime
- Administration of insurance and legal claims
- Garda vetting

3. *To protect the vital interest of you or another person* – under extreme circumstances Barrow Training would share your personal data with third parties to protect your interests or those of another person, for example:
 - Providing medical or emergency contact information to emergency services personnel
 - Contacting you or your next of kin, in case of an emergency

4. *Consent* – under certain circumstances, Barrow Training will only process your personal data with your explicit consent. Explicit consent requires you to make a positive, affirmative action and be fully informed about the matter to which you are consenting, for example:
 - Dealing with enquiries by providing information on Barrow Training courses and other programmes of study that may be of interest and benefit to learners, applicants and other interested parties
 - Promoting Barrow Training’s services (e.g. career guidance, consultancy)
 - Marketing, including images, online, in print and on social media; publications, invitations and other communications
 - Competition entries – As per the data retention schedule, contact details will be retained until competition closing date has passed and winner has been notified
 - References: Academic staff may agree to provide a reference for you if you apply for a job or further study. You should ensure that the requesting organisation is in a position to provide the academic staff member with a copy of your signed consent to the issuing of your reference to them
 - Participating in third party surveysYou will be given clear instructions on the desired processing activity, informed of the consequences of your consent and of your clear right to withdraw consent at any time.

7.4.9 Access to Data

As stated above, employees and learners have a right to access to access the personal data that Barrow Training hold on them, as per the Subject Access Request Policy (QF658). To exercise this right, data subjects should make a Subject Access Request using the Subject Access Request Form (QF792 – Appendix 1). Barrow Training will comply with the request without delay, and within 30 days unless, in accordance with legislation, Barrow Training decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge will be applied.

7.4.10 Data Disclosures

The Company may be required to disclose certain data/information of an employee to any person. The circumstances leading to such disclosures include:

- a) any employee benefits operated by third parties
- b) disabled individuals - whether any reasonable adjustments are required to assist them at work
- c) individuals’ health data - to comply with health and safety or occupational health obligations towards the employee
- d) for sick pay purposes

- e) HR management and administration - to consider how an individual's health affects his or her ability to do their job
- f) The smooth operation of any employee insurance policies or pension plans
- g) to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

7.4.11 Data Security

All our employees are aware that personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so that are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to employees or learners should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received from the Data Protection Officer. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where absolutely necessary.
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

7.4.12 Third Party Processing

Barrow Training may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below. This list will be updated periodically as required.

Barrow Training will only share your personal data with external third parties where we are required to do so under a statutory or legal obligation, or we are required to do so under a contractual obligation or we have your consent, or we are otherwise permitted to do so in accordance with data protection legislation.

The disclosure of your data to third parties includes:

- Accrediting Bodies – Quality and Qualifications Ireland (QQI) and Pre-Hospital Emergency Care Council (PHECC) – Sharing data relating to qualification recognition, quality assurance, and qualification details referenced to the National Framework of Qualifications
- External Software as A Service (SAAS) providers. Barrow Training has entered into commercial agreements with external software service providers to support and enhance teaching, learning and assessment and research mission of Barrow Training. These services include Learning Management Systems (Veri, Enovation and Training for Success), online discussion forums, lecture and tutorial recording, research publications, authenticity checking, and feedback and assessment. This sharing is governed by a Data Processing Agreement between the organisation and Barrow Training.
- Acuity Scheduling – When a learner books a course through our website, the information collected, i.e. learner contact details, is shared with Acuity Scheduling, the provider of our online booking service. Barrow Training deletes this information from Acuity Scheduling’s platform on a monthly basis.
- Department of Employment Affairs and Social Protection: Information may include details of your progression/completion to ensure continuance of funding
- Stripe – credit/debit card payment provider. Barrow Training will accept credit/debit card payment by phone. This information is processed during the phone call and is not stored by Barrow Training. Therefore, if payment processing is unsuccessful, you will be required to provide the information again.
- FCR Media (website providers) – By simply visiting our website, you do not disclose, nor do we collect, personal data about you. The information collected about your visit is limited to technical data such as:
 - the Internet address (or IP address) of the device you used to access this website
 - whether you reached the site using a search engine or if you clicked a link on another website
 - the type of web-browser you used
 - the type of device you used to access the Internet

We use this data for administrative and statistical purposes as well as to help us improve our website. This technical data does not provide us with the personal data of visitors to our website.

- Web Browsers via Cookies – A cookie is a small piece of data or text file sent by a website to the browser on your computer or mobile device when you are visiting a website. To measure performance, our website uses cookies on certain sections to gather data for statistical purposes only. You can modify your browser to accept or decline these cookies at any given time. Please note if some cookies are blocked, you may not be able to reach certain pages of our website.
- Revenue Commissioners
- Tenders – Details of relevant employees, tutors and company referees are shared in tender applications
- Awards – Details of relevant employees and tutors are shared in award nominations
- Regulatory Authorities – e.g. Office of the Ombudsman, Office of Data Protection Commissioner, Office of the Information Commissioner
- Legal advisors, Courts
- An Garda Síochána – prevention/detection of crime, apprehension and prosecution of offenders, protection of an individual’s vital interests/welfare or safeguarding national security
- Garda Vetting Bureau – details of learners who have applied for courses that require Garda vetting

- Insurance companies for the purpose of providing insurance cover or in the event of an insurance related claim
- External Authenticators – Assessment scripts for external review, quality assurance
- Employers, voluntary and charitable organisations – To facilitate cooperative and volunteering placements of learners
- Other training providers for external training such as Skillnet groups and County/City Chambers who may fund the training
- Financial sponsors – if a learner’s fees are paid by an external organisation (e.g. your employer, Community Employment Scheme), Barrow Training may share personal data relating to your attendance and academic progress
- Prospective employers for confirmation of qualification and provision of references with your consent
- Press and the media – with your consent we may share information about you for publicity and marketing purposes online, in print and on social media
- Data may be shared with reputable “data processors” for the purposes of sending communications (e.g. Mailchimp)

7.4.13 International Data Transfers

Barrow Training does not transfer personal data to any recipients outside of the European Economic Area (EEA).

7.4.14 Requirement to Notify Breaches

All data breaches will be recorded on our Data Breach Register. Where legally required, Barrow Training will report a breach to the Data Protection Commission within 72 hours of discovery. In addition, where legally required, Barrow Training will inform the individual whose data was subject to breach.

More information on breach notification is available in our Breach Notification policy (QF 656).

7.4.15 Training

Employees must read and understand Barrow Training’s policies on data protection as part of their induction. All employees also receive training in GDPR Awareness which must be refreshed every two years, as they have access to the secure data storage systems. This training covers protecting individuals’ private data, ensuring data security, and understanding the consequences of any potential breaches of the Company’s policies and procedures.

The nominated Data Protection Officer receives additional training in their role under the GDPR.

7.4.16 Records

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its Records Management and Retention Policy (QF 791). These records will be kept up to date so that they reflect current processing activities.

7.4.17 Data Protection Compliance

Barrow Training Data Protection Officer is:

Liz Doran

info@barrowtraining.ie 059 9721416

7.5 Learner Data Protection Privacy Notice (QF790)

7.5.1 Introduction

Barrow Consultancy & Training Ltd. (hereafter Barrow Training) must process the personal data of its learners (you) in order to carry out its functions and manage its operations. The processing of this data is carried out in accordance with the General Data Protection Regulation (GDPR)/Data Protection Acts 1988-2018 and with Barrow Training's Data Protection Policy.

Barrow Training is a registered Data Controller and is the Data Controller for personal data we process about you. The purpose of this Data Protection Privacy Notice is to explain how Barrow Training uses personal data we collect and hold about prospective, current and previous learners of Barrow Training. This notice should be read in conjunction with Barrow Training's Data Protection Policy and Compliance Regulations (available at <https://www.barrowtraining.ie/about/data-protection>).

This notice extends to all your personal data as defined under Article 2(1) of the General Data Protection Regulation (EU) 2016/679.

Why do Barrow Training hold your data?

1. Barrow Training must process your personal data in order to provide educational services through its teaching, research and associated academic and administrative activities, for example, recruitment of learners, provision of programmes of study, examinations, engaging with accrediting bodies and Government agencies such as Quality and Qualifications Ireland (QQI), Pre-Hospital Emergency Care Council (PHECC) and the Department of Education & Skills.
2. Barrow Training will process your personal data in order to promote programmes of study and in these circumstances your explicit consent will be sought to enable such processing.

7.5.2 Learners' Personal Data held by Barrow Training

Learner data is mainly obtained from the details you provide directly through the application/enrolment/registration process, or which your manager/supervisor provides, as well as your academic information, e.g. results, certification.

This is held by Barrow Training on its records systems including encrypted and password-protected Excel spreadsheets and the Veri Learner Management System. Learners engaged in Blended Learning will also have their name and email address stored on the Enovation Learner Management System.

Categories of personal data collected/recorded include:

- Name
- Postal and email addresses
- Phone number
- Date of birth
- Gender
- PPS Number
- Next of kin/emergency contact details

- Financial information (including details of funding and fees paid and outstanding)
- Image (for online platform) and proof of identification where necessary
- Garda vetting record
- Engagement with Barrow Training’s virtual learning environment activity
- Information about examinations, assessments and results, repeat examinations and learner progression
- Certificates awarded
- Details of disabilities (optional) and/or medical records (may be necessary in application for reasonable accommodation)
- Disciplinary, grievance procedures data
- IP address, and the type of device you are using when visiting the Barrow Training website on a mobile device

7.5.3 Lawful Basis for Barrow Training Processing Personal Data

Data Protection law requires that Barrow Training must have a valid lawful basis in order to process personal data. Barrow Training relies on a number of such bases as follows:

5. *The provision of a contract* – much of the personal information Barrow Training processes is necessary to meet its commitments to you, for example, processing your data in relation to teaching, assessment and associated administration. The following sets out the main purposes of which we process your personal data in the provision of a contract:
 - Dealing with enquiries
 - Recruitment and admission of learners
 - Provision of teaching and associated academic services including examinations, progression and related administration
 - Facilitating accreditation with professional and industrial bodies
 - Managing and administering learners’ educational contracts
 - Recording and managing learner conduct (including disciplinary procedures)
 - Maintaining learner records
 - Management and administration of learner finance (including fees and funding)
 - Graduation – type and status of graduate awards are publicly acknowledged at Barrow Training conferring ceremonies and are published in Barrow Training’s conferring booklet; Graduation ceremonies are regarded as public events and may be recorded and/or live streamed by Barrow Training.
 - Delivering plagiarism checking and academic validation services
 - Providing services necessary for the learner experience (including IT and communication services)
 - Providing support and maintenance services (including IT)
 - Safeguarding and promoting welfare of learners
 - Dealing with grievances and disciplinary actions
 - Dealing with complaints and enquiries
 - Providing careers and placement advice and services
 - Service improvement via feedback and surveys
 - Internal reporting and record keeping
 - Responding to data access requests you make
 - Inclusion in Barrow Training’s Outlook directory
 - Providing learner support services including:
 - Disability and learning support services
 - Careers and employment advice and services

- Health and wellbeing services
 - Barrow Training email distribution lists: as a registered learner you will automatically be added to a number of email distribution lists to enable Barrow Training to manage its operations and provide the full range of services to you. An opt-out option is not permitted for these operations and core services.
6. *The fulfilment of a legal obligation* – Barrow Training must process your personal data when required to do so under Irish/EU law, for instance:
- Sharing information with statutory bodies
 - Monitoring equal opportunities
 - Providing safety and operational information
 - Performing audits
 - Preventing and detecting crime
 - Administration of insurance and legal claims
 - Garda vetting
7. *To protect the vital interest of you or another person* – under extreme circumstances Barrow Training would share your personal data with third parties to protect your interests or those of another person, for example:
- Providing medical or emergency contact information to emergency services personnel
 - Contacting you or your next of kin, in case of an emergency
8. *Consent* – under certain circumstances, Barrow Training will only process your personal data with your explicit consent. Explicit consent requires you to make a positive, affirmative action and be fully informed about the matter to which you are consenting, for example:
- Providing information on Barrow Training courses and other programmes of study that may be of interest and benefit to learners, applicants and other interested parties
 - Promoting Barrow Training’s services (e.g. career guidance, consultancy)
 - Marketing, including images, online, in print and on social media; publications, invitations and other communications
 - References: Academic staff may agree to provide a reference for you if you apply for a job or further study. You should ensure that the requesting organisation is in a position to provide the academic staff member with a copy of your signed consent to the issuing of your reference to them
 - Participating in third party surveys

7.5.4 Protecting Your Personal Data

Your personal data may be shared between members of staff within Barrow Training in order for Barrow Training to fulfil its functions and objects.

In addition to the foregoing principle, Barrow Training will employ reasonable and appropriate administrative, technical, personnel, procedural and physical measures to safeguard your information against loss, theft and unauthorised users’ access, uses or modifications.

The following principles apply:

- *Confidentiality* – only people who are authorised to use the data will be authorised to access it. Staff are required to maintain the confidentiality of any of your data to which they have access.
- *Integrity* – Barrow Training will make all reasonable efforts to ensure that your personal data is maintained accurately and remains suitable for the purpose for which it is processed.
- *Availability* – that authorised users should be able to access the data if they need it for authorised purposes.
- *Security* – We are committed to ensuring that your personal data is secure with us and with the data processors who act on our behalf. We are continuously taking technical and organisational steps to better protect your information. Data Protection training has been made available to all staff.

7.5.5 Sharing Your Personal Data with Third Parties

Barrow Training may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below. This list will be updated periodically as required.

Barrow Training will only share your personal data with external third parties where we are required to do so under a statutory or legal obligation, or we are required to do so under a contractual obligation or we have your consent, or we are otherwise permitted to do so in accordance with data protection legislation.

The disclosure of your data to third parties includes:

- Accrediting Bodies – Quality and Qualifications Ireland (QQI) and Pre-Hospital Emergency Care Council (PHECC) – Sharing data relating to qualification recognition, quality assurance, and qualification details referenced to the National Framework of Qualifications
- External Software as A Service (SAAS) providers. Barrow Training has entered into commercial agreements with external software service providers to support and enhance teaching, learning and assessment and research mission of Barrow Training. These services include Learning Management Systems (Veri and Enovation), online discussion forums, lecture and tutorial recording, research publications, authenticity checking, and feedback and assessment. This sharing is governed by a Data Sharing Agreement between the organisation and Barrow Training.
- Acuity Scheduling – When a learner books a course through our website, the information collected, i.e. learner contact details, is shared with Acuity Scheduling, the provider of our online booking service. A Data Sharing Agreement exists between the Acuity Scheduling and Barrow Training.
- Department of Employment Affairs and Social Protection: Information may include details of your progression/completion to ensure continuance of funding
- Stripe – credit/debit card payment provider. Barrow Training will accept credit/debit card payment by phone. This information is processed during the phone call and is not stored by Barrow Training. Therefore, if payment processing is unsuccessful, you will be required to provide the information again.
- FCR Media (website providers) – By simply visiting our website, you do not disclose, nor do we collect, personal data about you. The information collected about your visit is limited to technical data such as:

- the Internet address (or IP address) of the device you used to access this website
- whether you reached the site using a search engine or if you clicked a link on another website
- the type of web-browser you used
- the type of device you used to access the Internet

We use this data for administrative and statistical purposes as well as to help us improve our website. This technical data does not provide us with the personal data of visitors to our website.

- Web Browsers via Cookies – A cookie is a small piece of data or text file sent by a website to the browser on your computer or mobile device when you are visiting a website. To measure performance, our website uses cookies on certain sections to gather data for statistical purposes only. You can modify your browser to accept or decline these cookies at any given time. Please note if some cookies are blocked, you may not be able to reach certain pages of our website.
- Revenue Commissioners
- Regulatory Authorities – e.g. Office of the Ombudsman, Office of Data Protection Commissioner, Office of the Information Commissioner
- Legal advisors, Courts
- An Garda Síochána – prevention/detection of crime, apprehension and prosecution of offenders, protection of an individual’s vital interests/welfare or safeguarding national security
- Garda Vetting Bureau – details of learners who have applied for courses that require Garda vetting
- Insurance companies for the purpose of providing insurance cover or in the event of an insurance related claim
- External Authenticators – Assessment scripts for external review, quality assurance
- Employers, voluntary and charitable organisations – To facilitate cooperative and volunteering placements of learners
- Financial sponsors – if a learner’s fees are paid by an external organisation (e.g. your employer, Community Employment Scheme), Barrow Training may share personal data relating to your attendance and academic progress
- Prospective employers for confirmation of qualification and provision of references with your consent
- Press and the media – with your consent we may share information about you for publicity and marketing purposes online, in print and on social media
- Data may be shared with reputable “data processors” for the purposes of sending communications (e.g. Mailchimp)

7.5.6 Transfer of Personal Data to other Countries

Your personal data will not be shared with third parties outside of the European Economic Area (EEA).

7.5.7 Retention of Data after you Complete your Training

Barrow Training retains all personal data in accordance with its Records Management and Retention Policy (QF 791). Barrow Training will need to maintain some records relating to you after you complete in order to provide services to you as a previous learner of Barrow Training. This includes:

- verifying your award

- providing transcripts of your marks
- opportunities for further study
- academic references
- careers support

Data that is not required to fulfil the services Barrow Training will provide to you after you complete your training will be securely deleted in accordance with Barrow Training's Records Management & Retention Policy (QF 791).

7.5.8 Your Rights

Your rights relating to your personal data include:

- to be informed (via this privacy notice and other communications)
- to request access to Personal Data held by Barrow Training, and to have any incorrect Personal Data rectified
- where appropriate, to the restriction of processing concerning you or to object to processing
- to have Personal Data erased, where appropriate
- to data portability regarding certain automated Personal Data
- with regard to rights within the legislation relating to "automated decision-making", Barrow Training does not use such processes and they do not arise
- to restrict the use of the data we hold and the right to object to Barrow Training using your data – please contact the Data Protection Officer if you believe your personal data is being used unlawfully or you have reason particular to your personal situation why we should not be processing it.

Requests for any of the above should be addressed by email to info@barrowtraining.ie or in writing setting out your specific request to Barrow Training's Data Protection Officer, Barrow Training, High Street, Bagenalstown, Co. Carlow, R21 TH22. Your request will be processed within 30 days of receipt. Please note, however, it may not be possible to facilitate all requests, for example, where Barrow Training is required by law to collect and process certain personal data including that personal information that is required of any learner of Barrow Training.

Additionally, you can update your personal data by contacting the Training Manager at admin@barrowtraining.ie.

7.5.9 Your Responsibilities

3. *Updating your details:* The GDPR requires that personal data is accurate. Please let Barrow Training know if your contact details change. If we do not have the correct contact details, we cannot take responsibility if we are unable to provide you with any information you require, for example, missing an exam or deadline resulting in serious consequences.
4. *Processing Personal Data:* You must comply with Barrow Training's Data Protection Policy and the GDPR if, as a learner, you have access to the personal data of others; or if you wish to collect or process any personal data as part of your studies or research. You must ensure that you notify and seek approval from your tutor before any processing occurs. If you are processing personal data other than as part of your studies, you should contact the Office of the Data Protection Commissioner (Supervisory Authority) as you will not be covered under Barrow Training's registration.

You can contact that Office at info@dataprotection.ie or by writing to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

7.5.10 Queries, Contacts, Right of Complaint

Further information on Data Protection at Barrow Training may be viewed at <https://www.barrowtraining.ie/about/data-protection>. You can contact Barrow Training's Data Protection Officer at info@barrowtraining.ie or by writing to Data Protection Officer, Barrow Training, High Street, Bagenalstown, Co. Carlow, R21 TH22.

You have a right to lodge a complaint with the Office of the Data Protection Commissioner (Supervisory Authority). While we recommend that you raise any concerns or queries with us first, you may contact that Office at info@dataprotection.ie or by writing to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

7.5.11 Review

This Privacy Notice will be reviewed and updated from time to time to take into account changes in the law and the experience

7.6 Records Management & Retention Policy (QF791)

7.6.1 Purpose

Barrow Consultancy and Training Ltd. (hereafter Barrow Training) is committed to the proper and effective management of the records and data it creates, receives, captures, maintains, or otherwise processes, in all formats, in the course of its operations, academic and administrative, in a manner which:

- is transparent, consistent, and accountable
- meets legal, regulatory, and audit requirements
- supports the efficient conduct of its business
- protects the security and integrity of Records and Data, including Personal Data
- ensures the preservation of Archives documenting its history and development

Barrow Training recognises that records management is a collaborative process, which calls for the support and active participation of management and staff at all stages, including design, implementation, compliance, and review. Engagement is essential to achieving the purposes of this Policy.

It is acknowledged that the greater part of Barrow Training's records is now held in digital formats, including records comprised of data within digital systems. Barrow Training commits itself to ensuring its record systems, for both digital and hard copy records, support records management processes and the purposes of this Policy.

Particular recognition is given to Barrow Training's obligations as a data controller and processor towards data subjects under Barrow Training's Data Protection Policy and Data Protection legislation, and to the special and limited derogations given under that legislation for processing data for research and statistical purposes, and for archival purposes in the public interest.

7.6.2 Scope

This Policy applies to all records, in all formats, created, received, maintained, or otherwise processed in the course of the activities of Barrow Training including, without limitation, hard copy and digital records. Personal records unrelated to Barrow Training activities are not within the scope of this policy. Staff are advised to avoid maintaining such records within Barrow Training systems (e.g., email servers, network folders), as doing so may place them within the scope of legislation such as Freedom of Information.

7.6.3 Records Management

Records Management is the application of controls and procedures to the creation, maintenance, use and disposal of records in accordance with approved procedures.

Records Management includes, but is not limited to, records classification; management of filing systems, retention scheduling; the administration of inactive records storage; management of record conversion programmes; disaster planning; vital records protection; archival preservation activities and appropriate destruction of records.

7.6.4 Ownership of Records

All records (including emails, images, photographs, databases etc.) that are created by Barrow Training employees in the course of their duties are the property of Barrow Training. All records received are in the care of Barrow Training and are also subject to Barrow Training's overall control and to the provisions of this policy.

7.6.5 Responsibilities of Barrow Training Employees

This policy applies to all areas and locations of Barrow Training and includes all departments and areas of work which form part of Barrow Training structure.

Operational responsibility for the implementation of this policy rests with the Manager in each Academic/Administrative area.

Where records are used by more than one department, clarity about which department has primary/final responsibility for management of the records should be established between the relevant department

The confidentiality of information within records must be safeguarded at all times. It is the responsibility of each department to ensure that the appropriate security measures are observed for maintaining records containing personal or other confidential information.

Once records have been retained by the creating department (in situ or offsite storage) for the requisite time as stipulated in the attached retention schedule, they must be destroyed or archived for permanent retention as set out in the schedule.

When scheduled for destruction, records must be shredded, pulped, or otherwise disposed of securely. The manner of destruction of records must be appropriate to the level of confidentiality of the records.

In the case of in-house destruction, the department/office/unit should document and retain the date and manner of destruction of records. In the case of third-party destruction, a certificate or docket confirming destruction should be received and retained as proof of destruction.

7.6.6 Definitions

Record

Records are documents in all formats, which are created/received and maintained as evidence of business completed or as a source of knowledge and which must be retained for as long as required to meet legal, administrative, financial, operational or historic needs of Barrow Training.

The Freedom of Information Act, 2014, defines a 'record' as follows:

- a) "a book or other written or printed material in any form (including in any electronic device or in machine readable form)
- b) a map, plan or drawing
- c) a disc, tape or other mechanical or electronic device in which data other than visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the disc, tape or other device
- d) a film, disc, tape or other mechanical or electronic device in which visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the film, disc, tape or other device
- e) a copy or part of any thing which falls within paragraph (a), (b), (c) or (d)."

Record Series

Groups of related records, which are created and used with a common purpose, for example, financial records; personnel records; examination results, committee minutes etc.

Records Classification

The procedure where records are identified and categorised for filing on the basis of their subject and are assigned a file name for efficient retrieval.

Active Record

Active records are records, which are required and referred to constantly for current use, and which need to be retained and maintained in office space and equipment close to users.

Semi-Active Record

Semi-active records are records, which are referred to infrequently and are not required constantly for current use. Semi-active records are often removed from office space to off-site storage until they are no longer needed.

Inactive Record

Inactive records are records for which the active and semi-active retention periods have lapsed, and which are no longer required to carry out the functions for which they were created.

Permanently Valuable Records – Archives

Permanently valuable records include those with legal, operational, administrative, historical, scientific cultural and social significance.

Disposition

Disposition is the action taken in regard to the disposal of active records, which can involve physical destruction by means of security shredding or recycling; transfer to archival storage for selective or full retention; or special disposition through a formal act of alienation from the custody of Barrow Training.

Records Retention Schedules

A Records Retention Schedule is a control document that describes Barrow Training's corporate records at a series level and indicates the length of time each series should be retained prior to final disposition; and the final disposition of each series. This document serves as the legal authorisation for the disposal of records.

7.6.7 Forms of Records

Records may exist in a variety of physical forms including:

- paper documents (written or printed matter)
- electronic records (i.e. word processing files, databases, spreadsheet files, emails, electronic data on any media etc.)
- books, drawings, and photographs
- anything on which information is recorded or stored by graphic, electronic or mechanical means
- copies of original records

7.6.8 Electronic Records

The nature of electronic records requires that consideration be given to security, authenticity, accessibility, version control, preservation (e.g. back-up of records) and the disposal of such records.

Staff must employ the following good housekeeping practices in the management of electronic records:

- sensible and consistent naming of files and folders
- systematic indexing/classification of records
- backup of appropriate files on a regular basis
- delete records regularly (including email records) in accordance with the attached retention schedule

- restrict access to record systems (use of passwords, timed lock out of PCs, etc.)
- particularly sensitive records to be emailed to external bodies should be password protected
- produce paper copies if required to maintain the integrity of manual files

In the case of electronic records where the computer equipment is maintained by a local external IT Support company – Business IT Solutions (BITS), Barrow Training must formally agree backup and recovery procedures with BITS. This is to ensure that there is no ambiguity as to which office is responsible for records in the event of hardware failure or accidental deletion of records.

Where electronic records are kept on systems not maintained by BITS, a formal inventory of such records must be maintained by the head of academic/administrative area.

7.6.9 Management and Retention of Records

Records should be retained for as long as they are required to meet the legal, administrative, financial, and operational requirements of Barrow Training during which time, they should be filed appropriately. Following a period of time, as set out in the attached retention schedule, they are either archived or destroyed.

Barrow Training records must be sorted and filed on a basis that ensures efficient retrieval.

Appropriate filing/archiving or destruction of records is to be carried out in accordance with the attached retention schedule.

The retention schedule is based on a determination of legal retention requirements as defined in relevant legislation (Health, Safety and Welfare at Work Acts 2001 & 2005; Freedom of Information Act 2014; General Data Protection Regulation (GDPR) and Data Protection Acts 1988-2018 etc.) as well as Barrow Training policies and procedures, administrative and operational requirements, historical value and general best practice.

7.6.10 Record Retention Schedule

The records retention schedule in Appendix 2 prescribes the retention period for a range of records held by Barrow Training.

Any department which considers that records should be retained for a longer period than that set down in Barrow Training retention schedule is required to consult with the Data Protection Officer to ensure that reasonable justification exists for their retention and, in the case of records which contain personal information, to ensure compliance with the GDPR and the Data Protection Acts (1988-2018).

7.7 Provision of Programme Information

Barrow Training is committed to providing accurate, impartial, objective and readily accessible information about the programmes and services which they offer. Information that is published on programmes offered by Barrow Training include the following:

- Programme Title
- Award Type
- NFQ Level (if applicable)
- Credits (if applicable)
- Awarding body and relevant quality assurance procedures
- Programme Background

- Information relating to accreditation/validation of programme, including self-certified programmes
- Profile of potential learners
- Entry Requirements
- Transfer & Progression
- PEL Requirements
- Detailed Programme Outline
- Teaching and Learning Mechanisms and Relevant Supports
- Assessment Information
- Tutor Details
- Learner Testimonials
- Programme Schedules
- Programme Pricing

This is approved for accuracy by the Training Manger prior to publishing. Some of the information above is provided to potential learners and other stakeholders through the following channels:

- Barrow Training website www.barrowtraining.ie
- Social networking sites such as Facebook, Twitter, Instagram and LinkedIn
- Prospectus
- Flyers
- Newsletters
- Promotional emails from Mailchimp

7.8 Publication of Information

Barrow Training publishes the following information with respect to the quality of its programmes:

- Programmatic Review Reports (Self-Evaluation and Reports of the Expert Panel and/or relevant awarding body)
- Institutional Review Reports (Self-Evaluation and Reports of the Expert Panel and/or relevant awarding body)
- Learner/Client Testimonials

7.9 Appendix 1 – QF792 Subject Access Request Form

Subject Access Request Form

Request for Access to Personal Data under the General Data Protection Regulation 2018. Please return the completed forms, together with a copy of proof of identity, by email to info@barrowtraining.ie or by post FAO Data Protection Officer, Barrow Training, High Street, Bagenalstown, Co. Carlow, R21 TH22. The request will be processed within 30 days of receipt.

Name: _____

Phone: _____

Email: _____

Address: _____

Choose which of the following best describes your relationship with Barrow Training:

Past/Current Learner

Past/Current Employee

Other (*please provide details*)

My preferred form of access is:

To receive photocopies by post

To receive soft copy by email

To receive photocopies by hand

Other (*please provide details*)

In accordance with the GDPR, I request access to the following personal data that I believe Barrow Training holds about me:

A description of the data held

A copy of the personal data held

7.10 Appendix 2 – Records retention Schedule Governance and Administration Records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Business Development Plans	Retain indefinitely	Appropriate filing/archiving
Management System Procedures	Retain current until superseded	Appropriate filing/archiving
Business Operating Procedures	Retain current until superseded	Appropriate filing/archiving
Quality Assurance Policies and Procedures	Retain current until superseded	Appropriate filing/archiving
Records of Board of Management, Quality Assurance Committee and Programme Development Committee Meetings e.g. agenda, minutes, documents relating to agenda items, voting records	Retain indefinitely	Appropriate filing/archiving
Records of Team Meetings which may contain learner details	Retain for 7 years after actions completed	Confidential shredding/secure deletion of electronic records
Risk Register	Retain for 7 years after superseded	Confidential shredding/secure deletion of electronic records
Organisational Structure	Retain current until superseded	Appropriate filing/archiving
Circulars, memos re policy matters	Retain until policy to which they relate is superseded	Appropriate filing/archiving
Projections and statistical analyses	Retain for 7 years	Confidential shredding/secure deletion of electronic records
General (non-HR) written Allegations/Complaints: records received/created as a result of investigating allegations/complaints	Retain for 7 years after resolution of complaint or from date of last correspondence	Confidential shredding/secure deletion of electronic records
General (non-HR) written Allegations / Complaints: records received/created as a result of investigating allegations/complaints - significant cases which set precedents or result in changes to Barrow Training policy	Retain indefinitely	Appropriate filing/archiving

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Handwritten notes taken by recording secretary present at meetings	Retain until minutes have been agreed	Confidential shredding
Routine administration records	Retain for current year, or until they cease to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
General correspondence, including emails <i>(Where content of an email and/or its attachment(s) fall under another specific class of record in this Records Retention Schedule, it should be handled, retained, and disposed of appropriately as set out in in the relevant section of the Schedule)</i>	Retain for current year, or until they cease to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
ISO, QOI and PHECC Audit Reports	Retain indefinitely	Appropriate filing/archiving
Quality Assurance Manual, Quality Reports, Quality Assurance Peer Reviews	Retain until superseded	Appropriate filing/archiving
Training schedules	Retain until superseded	Appropriate filing/archiving
External liaison – e.g. correspondence with accreditation bodies	Retain indefinitely	Appropriate filing/archiving
Records of awards	Retain indefinitely	Appropriate filing/archiving
Legal cases, advice, and any correspondence	Retain indefinitely	Appropriate filing/archiving
Copyright records/trademark registrations	Retain indefinitely	Appropriate filing/archiving

Academic and Learner Records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Programme development/accreditation records and reports	Retain indefinitely	Appropriate filing/archiving
Re-engagement records and reports	Retain indefinitely	Appropriate filing/archiving
Learner enrolment record including name and contact details	Retain indefinitely	Appropriate filing/archiving
Learner records including: Personal information, e.g. date of birth, PPSN; fees/payment records; extenuating circumstances forms; requests for extensions; transfer; exemptions; reasonable accommodation	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Correspondence with learners	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Learner discipline records	Retain for duration of studies plus 7 years	Confidential shredding/secure deletion of electronic records
Garda Vetting records	Retain for duration of studies plus 1 year	Confidential shredding/secure deletion of electronic records
Examination papers (and related records i.e. recommended marking scheme, sample answers, where relevant)	Retain indefinitely	Appropriate filing/archiving
Records which contribute towards module grade and which have not been returned to learners: e.g. examination scripts, assignments, projects, portfolios, skills demonstrations video/photographic evidence and written reflections, learner records	Retain for 1 month following deadline for appeal	Confidential shredding/secure deletion of electronic records
Assessments which undergo appeals procedure	Retain for 2 years after action completed	Confidential shredding/secure deletion of electronic records
Internal verification reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records
External authentication reports and all correspondence	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Results approval panel meeting minutes	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Tutor monitoring reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Cross-moderation reports	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Records of module grades	Retain indefinitely	Appropriate filing/archiving

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Amendment to marks, published results/grade alteration correspondence	Retain indefinitely	Appropriate filing/archiving
Learner academic transcript	Retain indefinitely	Appropriate filing/archiving

Finance Records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Accounts payable – batches of invoices; tax clearance certificates	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Accounts receivable – debtors ledgers; income listings; income control accounts; receipts reconciliation	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Bank records – paid cheques; bank reconciliation; bank statements	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Financial statements – annual financial statements; final budget reports	Retain indefinitely in original form	Appropriate filing/archiving
Asset register	Retain indefinitely in original form	Appropriate filing/archiving
Agreements – Rental; Lease; Use; Occupancy	Retain indefinitely	Appropriate filing/archiving
Audit reports/records	Retain indefinitely in original form	Appropriate filing/archiving
Internal financial policies, accounting standards, procedures	Retain until superseded	Confidential shredding/secure deletion of electronic records
Expenses/Travel claims forms, all supporting receipts	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Credit card statements	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Stripe proof of payment	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Customer payment information, e.g. debit card details	Destroy immediately	Not recorded or stored
Cancelled cheques	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
Receipt books	Retain for current year plus 6 years	Confidential shredding/secure deletion of electronic records
General correspondence	Retain for current year, or until they have ceased to be of administrative use	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Contracts for services	Following completion of contract, retain for current year plus 6 years	Appraise and evaluate for archiving where relevant. Otherwise, confidential shredding/secure deletion of electronic records
Employee pension information	Retain indefinitely	Appropriate filing/archiving
Payroll – Pay-sheets, authorisations to deduct tax details of staff, appointment details, payslips	Retain on personnel file for duration of employment and for 5 years after last pension payment	Confidential shredding/secure deletion of electronic records

Human Resources Records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Recruitment - Vacancy notification, Advertisement copies, Job description, Selection criteria	Retain indefinitely	Appropriate filing/archiving
Applications and CVs of candidates not qualified or short listed for interview; Applications and CVs of candidates shortlisted for interview but who do not attend; Applications and CVs of candidates shortlisted and who attended interview but who are not successful or who are successful but do not accept offer	Retain until review period has passed, final appointment has been approved plus 2 years	Confidential shredding/secure deletion of electronic records
Interview Board marking sheet, Interview Board notes, and recommendation by Interview Board	Retain until review period has passed, final appointment has been approved plus 2 years	Confidential shredding/secure deletion of electronic records
Personnel Files - May include such records as: Personal contact details Application form/CV/cover letter Contract of employment (Offer of appointment, Date appointed) Evidence of education qualifications References Questionnaire on Criminal Offences Probation forms Salary Service Records Completion of mandatory training (where relevant) Termination notices Training and development records Safety Training Records Leave records relating to: Sick Leave, Shorter-working year/Term-time, Job-share scheme, Part-time Working records, Parental leave, Adoptive Leave, Maternity Leave, Force Majeure, Jury Leave, Bereavement Leave	Retain on personnel file for duration of employment plus two years	Confidential shredding/secure deletion of electronic records
Annual Leave	Retain for 7 years	Confidential shredding/secure deletion of electronic records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Discipline records - Records relating to disciplinary actions taken against employees e.g. warnings, suspensions recorded, or copy warnings placed on an employee's personnel record etc.	Retain for 7 years	Confidential shredding/secure deletion of electronic records
HR Allegations and Complaints – Written Allegations/Complaints: records received/created as a result of investigating allegations/complaints	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Written Allegations and Complaints: records received/created as a result of investigating allegations/complaints – significant cases which set precedents or result in changes to Barrow Training policy	Retain indefinitely	Appropriate filing/archiving
Safety policies	Retain until superseded	Confidential shredding/secure deletion of electronic records
Safety Training Records	Retain on personnel file for duration of employment plus 2 years	Confidential shredding/secure deletion of electronic records
Risk Assessments Records	Retain for 7 years after superseded or after activity ceases, whichever relevant	Confidential shredding/secure deletion of electronic records
Incident Reports	Retain for 7 years after date of incident	Confidential shredding/secure deletion of electronic records
Safety audits, investigations, and safety evaluation records where cases result in significant changes to policy	Retain indefinitely	Appropriate filing/archiving
Third Party recommendations e.g. Labour Court, Equality Tribunal, Labour Relations Commissions etc.	Retain indefinitely	Appropriate filing/archiving
Individual industrial relations issues	Retain indefinitely	Appropriate filing/archiving
Claims records (e.g. correspondence, status records etc.)	Retain indefinitely	Appropriate filing/archiving

Other Records

General classes of records held by Barrow Training departments	Default retention period	Final disposition
Data submitted for the purpose of a course enquiry	Retain until enquiry has been responded to, and one-week follow up contact made	Confidential shredding/secure deletion of electronic records
Data submitted for the purpose of a competition entry	Retain until competition closing date has passed and winner has been notified	Confidential shredding/secure deletion of electronic records
BUILDING		
Maintenance records (buildings, structures, grounds)	Retain for 7 years following completion	Confidential shredding/secure deletion of electronic records
Records pertaining to security operations, lists of keys issued, office space	Retain until superseded	Confidential shredding/secure deletion of electronic records
Inspection Records (equipment etc)	Retain for 7 years from date of inspection	Confidential shredding/secure deletion of electronic records
INSURANCE		
Insurance Policies	Retain for 7 years	Confidential shredding/secure deletion of electronic records
Claims correspondence and records of providing legal support & representation in dealing with claims by or against Barrow Training which do not proceed to litigation or settlement by an agreement	Retain for 7 years following settlement or withdrawal of claim	Confidential shredding/secure deletion of electronic records
Claims correspondence and records of litigation with third parties	Retain indefinitely	Appropriate filing/archiving
COMPLIANCE		
Freedom of Information/Data Protection: decisions on requests	Retain indefinitely	Appropriate filing/archiving
Freedom of Information/Data Protection: other records relating to requests	Retain for 7 years after final action completed	Confidential shredding/secure deletion of electronic records