



## The Church of Ireland Theological Institute Data Protection: Privacy Notice, 2020

**Who we are:** We are the Church of Ireland Theological Institute (CITI). We are committed to meeting our responsibilities in relation to personal data, as outlined in the EU General Data Protection Regulation (GDPR) and the Irish Data Protection Act (2018). Our data protection manager is Jane Kelly, and she can be contacted at: [janeKelly@theologicalinstitute.ie](mailto:janeKelly@theologicalinstitute.ie).

The Representative Church Body, as data controller, has overall responsibility for compliance, governance and accountability. The RCB's data protection officer is Rebekah Fozzard, and she can be contacted at: [dataprotection@rcbdub.org](mailto:dataprotection@rcbdub.org).

**Purpose:** This notice is a statement of the CITI's commitment to protecting the rights and privacy of staff, students and visitors in accordance with Data Protection legislation.

**Scope:** This notice applies to all personal data created or received in the course of CITI's business in all formats, of any age. It applies to all locations where personal data is held by CITI. Personal data may be held or sent in paper or electronic formats or communicated verbally. All staff, students and visitors of CITI are also subject to the provisions in this notice.

**Staff:** A privacy notice for all employees, governing the management and retention of personal data including annual appraisals, has been issued by the Representative Church Body. A copy is available from the RCB's data protection officer. Personal data should not be processed outside this privacy notice.

**Students:** The CITI has a need to keep records to comply with the requirements of statutory authorities and university partners. Personal data is gathered by individual written submission, is kept securely in personal student files and is retained according to the guidelines stipulated below. A copy of the individual consent form is appended to this notice.



**Visitors:** The CITI must keep minimum personal data of those visiting CITI, staying in the accommodation and using the facilities. This personal data is collected from the individuals concerned and held according to our retention guidelines.

Personal data is collected in a number of ways, primarily:

- a) Consent – where the individual has given clear consent for CITI to process their personal data
- b) To comply with our legal obligations – where processing is necessary for CITI to comply with the law. We rely on this lawful basis for processing personal data as necessary for and connected with the performance of its statutory objects and functions. CITI also has a data processing agreement in place with Trinity College Dublin as stipulated in the Memorandum of Understanding (2018) between the House of Bishops and the University of Dublin
- c) To enter into and perform a contract - CITI uses personal information to carry out our obligations arising from any contracts entered into between two parties or to take the necessary steps prior to entering into a contract including to administer employment, financial or legal contracts and to pay for the services professionally provided to us
- d) For legitimate business interests – where CITI processes personal information for our legitimate interests, we will ensure that there is a fair balance between their legitimate interests and the data subject’s fundamental rights and freedoms
- e) For the establishment, exercise or defence of legal claims – CITI occasionally processes personal information, including sensitive personal information, such as information concerning health, religious or philosophical beliefs where it is necessary for the establishment, exercise or defence of legal claims
- f) Vital Interest – CITI may, in certain circumstances, use personal data where the processing is necessary to protect someone’s life
- g) Public Interest – CITI may, in certain circumstances, use personal data for the performance of a task carried out in the public interest. For example, CCTV is in operation at CITI.

**Safety and Security:** All personal data is kept securely in designated areas of CITI and the RCB. Computers and laptops are password protected and we follow the RCB’s Network and Computer Systems: Acceptable Usage Policy. A copy is available from the RCB’s Data Protection Officer.



CITI has undertaken a Data Privacy Impact Assessment which demonstrated that the use of a CCTV system is the most suitable way to protect our premise. A code of practice has been developed and is appended to this notice.

**Website Data Privacy Notice:** Our Privacy Notice is available on the CITI website. This informs you of the personal data that we collect and use in connection with our website. A hard copy of this notice is available on request.

**Email Correspondence:** Any group email will be sent in the category of 'bcc' to avoid disclosure of email addresses.

**Retention Guidelines:**

The following table provides a summary of agreed retention periods for various data gathered in the course of CITI's delivery of its programmes. All personal data will be stored according to the tabulation.

Staff Meeting Minutes, Exam Board Minutes (including External Examiner Reports), Course Management and Council Records are kept indefinitely. Health and Safety accident / incident records are kept for 10 years from the date of an accident and destroyed, unless there is a justifiable reason for archiving them. Some personal data may be retained in order to protect the CITI's interest, preserve evidence and for historical and/or archival purposes. Destruction of materials will include both hard copy and any electronic versions.

	Duration of studies plus 1 year	Duration of studies plus 7 years	Keep Indefinitely
Courts of Examiners		X	
Course Registration forms	X		
Vocational Growth Discernment Process – documentation and reports	X		
Annual Appraisals	X		
Placement reports	X		
Assignments	X		
Assignments mailbox	X		
Disciplinary reports	X		
Student box file	Contents to be offered to student when they finish. If		

	not taken can be destroyed		
Record of Studies			X
Student Attendance Tracker / Medical Absence Cert	X		
Garda / PSNI Vetting	X (after 12 months documentation that accompanied application form will be destroyed )		
Graduate Survey Summary Reports			x
Lay students Information including conditions of residence forms and contact details	X		
Other student contact details	X		
Student Personal Files	X		
Dissertation research		X	
Dissertations			X
Curacy	X		
Student Handbooks			X

**Individual Rights:** Your rights, subject to exemptions, include the right to access a copy of the data we hold on you; the right to request us to delete personal data that we hold about you; the right to request that any inaccurate data is corrected and the right to restrict or object to us using your personal data. If we are processing personal data based on your consent, you may withdraw that consent at any time.

Your rights are outlined in full in the RCB's Data Protection Policy.

## Conclusion



If you would like any further information, please contact the CITI's data manager. If you are unhappy with how we process personal data we ask you to contact us so that we can rectify the situation. You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission and they can be contacted on +353 ((0761) 104 800; via email: [info@dataprotection.ie](mailto:info@dataprotection.ie) or by writing to: The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co Laois, R32 AP23.



## Personal Data Consent Form.

Full Name	
Address	
Mobile Phone Number	
Email Address	
*Family details including spouse and children	

\*information required for family orientation day and ongoing support programme

I hereby consent to CITI receiving and retaining this information, and any other relevant information subsequently received, in line with its published GDPR policy.

Signed \_\_\_\_\_

Print Name \_\_\_\_\_

Date \_\_\_\_\_



## **Church of Ireland Theological Institute**

### **CCTV Code of Practice**

CITI has undertaken a Data Privacy Impact Assessment (2018) which demonstrated that the use of a CCTV system is the best and most efficient way to protect our premise and to keep it secure. We operate CCTV on our premise 24hrs a day and have notices in prominent places to inform people CCTV is being used. Staff using the CCTV system have been trained and are aware of their role and responsibilities.

CITI adheres to the following code of practice:

#### **Storing and viewing CCTV information**

Images and recordings are only collected for specific, explicit and legitimate purposes, and are safely stored so they will not be damaged. CITI keeps a record of who has access to the system and limit access of live images. Recorded images will be viewed in a restricted area. CITI will not hold on to images for longer than has been agreed with in the retention policy, and a record of any irregular deletions from the CCTV system will be documented.

#### **Disclosure**

Information from the CCTV System will not be shared outside of the organisation unless to comply with an order from An Garda Siochana or other legal reasons including insurance claims. Any person whose image is recorded on CCTV system has the right to seek and be supplied with a copy of their own personal data from the footage. The personal data should be provided in electronic format where possible.

- Where images of parties other than the requested data subject appear on the CCTV footage, CITI will pixelate, redact or darken out the images of those other parties before supplying a copy of the footage to the requester.
- All dates and times of requests, including details of requester, will be documented.

#### **Retention**

31 days is the length identified by CITI to hold onto recording information. After this time the system automatically overwrites the data. Exceptions apply only if instructed to do so from An Garda Siochana or other legal reasons including insurance claims.

- There are measures in place to ensure the permanent deletion of information after 31 days.
- CITI undertakes systematic checks to ensure that the retention period is being complied with in practice.



## **Letting people know**

CITI is proactive in letting people know that CCTV is in operation. Clear signs that are visible and readable have been in areas where CCTV is operational. CITI has included contact details, the purpose for using the system and details of who to contact with any queries. This code is also on the website and noticeboard.