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1 Information Management

1.1 Policy Owner

The policy owner is the Board of Directors.

1.2 Purpose

The purpose of this policy is to set out Cenit College's commitment to ensure that they have robust and secure systems in place to.

- Facilitate the availability of reliable information and data for informed decision making.
- To ensure that Cenit College knows what is working well and what needs attention.
- To ensure that controls and structures are in place to generate names data/reports which are communicated to staff and management for self-monitoring and planning purposes.

1.3 Scope

This policy is applicable to all records and documents created within Cenit College and those that are received and maintained by staff in the process of carrying out their duties within Cenit College.

1.4 Responsibilities

The following personnel are responsible for Data Management within Cenit College

Role	Responsibility
Board of Directors	Overall responsibility for Data Management within Cenit College.
Management Committee	Responsibility to execute the policy.
Financial Controller	Maintaining all financial records
Staff	ensuring compliance in their respective roles and duties.
IT Manager	• maintaining our server where data is held i.e., security, configuration and maintenance. • Back-up(s) • VLE and storage of data • The IT Manager will monitor the IT environment and perform regular maintenance checks
Head of Training	Responsible for preparing reports
Examinations Officer	Transferring results into the awarding body's system
Quality Manager	Responsible for all data in relation to the quality assurance of Cenit College's activities.

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Data Protection Manager	The Data Protection Manager has the following responsibilities in accordance with article 39 of GDPR. ● to inform and advise Cenit College and the employees who carry out processing of their obligations pursuant to GDPR and to other data protection legislation. ● to monitor compliance with the GDPR, with other data protection legislation and with the policies of Cenit College in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits. ● To provide advice, where requested, as regards data protection impact assessment (DPIA) and to monitor their performance pursuant to Article 35 of the GDPR. ● To cooperate with the Office of the Data Protection Commissioner. ● To act as a contact point for the Office of the Data Protection Commissioner on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate regarding any other matter. ● To act as a liaison with the Office of the Data Protection Commissioner in connection with personal data breaches, when requested by Cenit College. in the performance of his/her tasks have due regard to the risk associated with processing operations, considering the nature, scope, context, and purposes of processing.
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1.5 Policy Statement

Cenit College recognises that reliable information and data is important for decision-making and to understand what is working well and what needs attention. In order to have reliable information, it has to be entered and maintained accurately. Cenit College is committed to collecting, processing, storing, managing, and destroying personal data in accordance with General Data Protection Regulations (GDPR) and any other relevant legal or regulatory body requirements. This policy has been developed to ensure Cenit College is committed to ensuring its data and information is reliable, but

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the college's information systems are robust, secure and well managed and maintained. All management, staff, contractors, and learners are required to maintain and respect the integrity, security and purpose use of all data.

1.6 Information Systems

Cenit College has several IT systems and platforms to support all the information types that are required to successfully run its operations, support decision making, learning activity and communication, and sharing of information with its learners and other stakeholders. These systems support both current and future operational requirements. The main cloud-based data management platforms used by Cenit College include:

BrightHR – A system for retention of staff information including Tutors and Training Support Staff. This is a cloud-based system.

SharePoint and OneDrive – Storage of files, data and documentation. This is a cloud-based storage system which enables all the Cenit College documentation and files to be stored off-site. The service is encrypted and guaranteed to have 99.99% uptime.

Outlook (MS Office) – Email communication. This is a cloud-based email service. It has 99.99% uptime, and all information is encrypted.

MS Teams – used to facilitate online lectures, managed centrally. Recordings are also done and stored for the duration required.

Cenitsys – a Cenit College bespoke administration system designed in-house that contains all course information, learner details, learner registration details, assessments scores, attendance records, work placement records and feedback and evaluation information.

Moodle – Moodle is Cenit College's learning management system (LMS). This secure platform facilitates the hosting of course learning materials assessments and uploading learner's assignments.

1.6.1 IT Service Management

The IT service management team led by the IT manager is responsible for the following.

- Back-up(s)
 - Shared Drives – Backups are every 24 hours.
 - Internal Systems/LMS - Backups are run Daily through the hosting site (AWS etc.)

The IT Manager will monitor the IT environment as follows.

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- Regularly preform maintenance checks on the IT Infrastructure server side. Logs are analysed and sent to IT Administrator regularly for review.
- Anti-Virus reports are sent to the IT Administrator every week for review.
- A six-monthly check on remote company devices
- Internal Systems hosted and monitored by @learnskills.org (Moodle/Cenitsys)

1.6.2 Disaster Recovery

Cenit College has a physical DR Policy.

- Backups held of emails/Shared drives in the event of a catastrophic failure. Cenit College uses the **High Availability** Cloud based services.
- Administration Systems/LMS – Cenitsys.com backed up nightly/Backup site available if fail over is required.
- Servers on site
 - Backup Domain Controllers on site
 - RAID Controllers

1.6.3 Firewall

Cenit College firewalls are monitored and managed by an external company (INTELLICOM) and also monitoring is completed by the Cenit College IT administrator(s)

1.6.4 Antivirus monitoring and management.

Antivirus monitoring is completed using a central portal, all devices are monitored to ensure the latest version of the software is managed accordingly. (Bitdefender Gravity Zone Business Security)

1.6.5 Helpdesk and onsite support

- Cenit College has a central helpdesk service that is monitored and managed by the IT Administrator(s). Who support IT users remotely and on-site.
- Internal systems/LMS have disaster recovery support from an external company, day to day support from assigned staff members.
- MS Office Suite is supported by Microsoft.

1.6.6 Security of devices

- Antivirus
- Azure AD joined.
- BitLocker
- 2 Step Authentication where applicable

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- Non-Admin access
- Training

1.7 Administration System

Cenit College's administration system is a robust comprehensive management system that is capable of:

- Maintaining secure learner records for current use and historical review
- Providing reports required for internal quality management and improvement.
- Generating data required for, and compatible with, external regulatory, professional, or national systems as appropriate.
- Generating statistical and other reports to meet internal and external information requirements, for example, on the QQI database of programmes and awards as prescribed by the legislation.
- Ensuring that the database is maintained securely and that data relating to learner assessment is accurate and complete.

Cenitsys is a bespoke administration system which is both in-house built and maintained by our IT department. It hosts learner information such as:

- Learner personal details upon registration
- Assessment results
- Work placement details
- Attendance records
- Other learner information and records as relevant

Cenit College ensures the administration system follows GDPR data protection and records retention obligations. Furthermore, this system is in full compliance with Cenit College's obligations for all the awarding bodies it has received validation from.

Cenitsys access is controlled by permissions which are role based. These roles give users access to varying components of the system. This access is secured through personal and individual userID and passwords and two step authentications. This ensures the data's integrity and personal data's transparency – as required by GDPR legislation. Learners have access to Cenitsys for permission layers that are related to the relevant learners. This facilitates learners for access to just the programme they are registered on. Learners can complete the following on the administration system.cybe

- Registration

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- Uploading of work-placement timesheets
- Access to their personal information area
- View their attendance details in read-only format.
- Programme timetable
- Other programme documentation as relevant

Cenit College has in-house technical expertise for developing and maintaining the administration system and dealing with the operation use of the system. The college also has arrangements in place for back-up of all the data held on this system.

1.8 Learning Management System

Moodle is the current learner management system used in Cenit College. Moodle hosts the following information:

- Programme learning materials (video's, manuals, reference materials, case studies and exercises)
- Quizzes
- Forums
- Facilitates the uploading of learner assignments.

Learners can access the LMS via their userID and personal password. Access is based on the programme they are studying and only for that duration.

Cenit College has in-house technical expertise for maintaining the LMS and dealing with its ongoing operational requirements. The college also has arrangements in place for back-up of all the data held on this system.

1.9 Information for Decision Making

Cenitsys the learner administration system has the capability of generating reports on learner retention, progression, completion, and learner attainment. The system is capable of generating reports that perform comparative data analysis for that respective programme. This will aid decision-making and inform future improvements and changes. The Head of Training is responsible for generating these reports. Learner satisfaction surveys are carried out by giving learners access to this area on Cenitsys. The programme lead is responsible for ensuring each learner completes this survey. The Head of Training Liaise with Programme Coordinators These reports feed into the monitoring reports for each programme.

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Senior members of the organisation scrutinise these reports for patterns, trends, divergences, or discoveries, which assist in benchmarking and help inform decision-making. Further data analysis may sometimes be needed to evaluate opportunities or eliminate any issues. A report on this data analysis is incorporated into the programme monitoring report. This can be used to inform changes to the programme.

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1.10 Record Maintenance and Retention

We specify data retention periods. The Cenit College QQI retention schedule is set out as below:

Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
Enquiries	Learner makes an Enquiry via website/social media/phone call/Email	• Full Name • Email Address • Phone Number	Lead generation Enquiries	Retain for 6 Months	Automatic	Email Web Form
Course Application	Completed Applications forms.	• Full Name • Email Address • Phone Number	To process applications.	<u>Successful Applicant:</u> Retain for duration of studies + 1 Year. <u>Unsuccessful Applicant:</u> Retain for 1 year after application.	Automatic	Learner Administration system
Verification	Verification of eligibility to the course and eligibility for recognition of prior learning (if applicable)	• Full Name • Email Address • Phone Number • Date Of Birth • Gender • Postal Address • Evidence of prior learning (if applicable) • Results of any aptitude or language tests • Employment Information	As supporting evidence. provide evidence of previously completed QQI modules. DOB retained as proof of age (learner over 18) Postal address retained as proof of residency.	<u>Successful Applicant:</u> Retain for duration of studies + 1 Year. <u>Unsuccessful Applicant:</u> Retain for 1 year after application.	Automatic	Learner Administration system
Payments	The payment for the course by the learner (if applicable)	• Name • Email • Course • Payment Information • Payment Amount	Legal Retain record of mode of payment, first and last 4 digits of card only.	7 Years (Financial obligation)	Automatic	WooCommerce Stripe Surf Accounts

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
Registration	Learners have been offered and accepted a place on the course. They complete the Course Registration form on our Learner administration. System	- Name - email address, - phone number, - where did you hear about the course	For communication with learners throughout and until all assessments are processed. For marketing research, we ask where the learner has heard about us so we can gauge which method of marketing works best for QQI courses.	Retain for duration of studies + 1 Year.	Automatic	Learner Administration system
Induction	Welcoming learners to the course. Informing learners of systems used and enrolling learners on the learning management system	- Name - Email - Email communication - IP Address	For attendance purposes	Retain for duration of studies + 1 Year.	Automatic	Email Webinar Software (Zoom Teams)
IT Support/Helpdesk	IT Dept. logging in remotely to learners pc Helpdesk Application	- Name - Email - Email communication to learners - IP Address	A log of what support was given.	Retain for 6 Months	Automatic Manually (Webinar Software)	Email Webinar Software (Zoom Teams)
Access to courseware	Access to Learning Management System	- Name - Email address - IP Address	Only retained for course duration	Retain for duration of studies + 1 Year.	Automatic	Learning Management system
Assessments/Examinations	Learners' complete assessments either in person on remotely via e-proctoring Peer Review, EA Report & IV Reports to be stored on SharePoint	- Name - PPSN - ID sighted (not retained) - Sign in sheets - recordings	Processing of assessments and results	After RAPS appeal process has passed and once certificates have been posted and learner has confirmed receipt.	Manually shredded (sign in sheets, assessment material (if applicable)).	Learner administration System SharePoint Fireproof Safe at location

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
		learner's assessments material			Automatic deletion of Softcopy files Peer Review, EA Report & IV Reports to be kept indefinitely on SharePoint (No learner data)	
Appeals	A learner appeals a decision as per appeals policy.	- Full Name - Email address - PPSN - Phone Number - Nature of appeal		<u>Successful Applicant:</u> Retain for duration of studies + 1 Year. <u>Unsuccessful Applicant:</u> Retain for 1 year after application.	Automatic	Learner administration System
Course Formally Starts	All online classes are recorded	Recordings	Recordings are kept until the end of the course to allow learners who may miss a session or those who wish to review a session access to do so. Recordings also kept as may be evidence for any complaints or appeals	Retain until the end of course + 6 weeks	Automatic (Learner administration system) Manual (Webinar Software)	Learner Administration System Webinar software (Teams/Zoom)
Monitoring	Attendance monitored on Learner administration system. Learner made aware at Induction.	- Full Name - Email address - Login dates and times - Attendance records	To help monitor learner progress on a course. To help identify if supports /	Retain for duration of studies + 1 year	Automatic	Learner Administration System Moodle

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
	Learner engagement monitored on learner administration system & learner management system	IP Address	intervention may be required			
Feedback and review	Learners complete Mid-course and end of course questionnaires Feedback is shared with learners on their assessments and a record of receiving this feedback is stored on our Learner Mgt. System Quarterly QQI reviews held	- Full Name - Email Address	For Quarterly Programme reviews Records of receiving feedback is kept as evidence for any complaints or appeal	Retain for duration of studies plus 1 year	Automatic	Learner Administration System Learner Management System
Intervention	Systems can report where intervention is required,	- Full Name - Email Address	To help identify if any learner is struggling in terms of attendance and course progression. To keep a record of interventions in a single course	Retain for duration of studies plus 1 year	Automatic	Learner Administration System Emails
Support	Learners may request support from tutor, administrator or Programme Co-ordinator. Record of request and action taken to be stored on learner management system.	- Full Name - Email Address - Phone number - detailed description of reason of request for support, medical records or other personal records	To keep a record of supports requested and offered Kept as evidence for any complaints or appeals	Retain for duration of studies plus 1 year	Automatic	Emails

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
eProctoring	Used for the purpose of delivering examination activities to learners remotely.	• Full Name • Email address • Learner ID-number or pseudonymized identifiers such as Candidate ID • Learner ID (Captured in recording) • Screen recording of the PC of the learner. • Webcam recording of your environment including your face. • Smartphone camera recording of your environment. • Associated exam institute of the examinee.	Validity of exams and for usage in any appeals of results Learner ID photo - for learner identification Recordings of proctored session - for review to ensure academic integrity Learner registration on Proctoring Platform for assessment (email and name and assessment) - to enable the learners to take the exam and proctoring to take place during assessment. Proctoring reports - reports of online assessment process for academic integrity.	6 Months after exam	Automatic	Remote proctoring system
Grades and Certs	Learners are issued letters stating provisional results Learners are issued their programme certificates	• Name • Postal address	Kept as evidence for any complaints or appeals	Copes of certs are not kept. Overall results retained for duration of studies plus 1 year	Automatic	Learner Administration System SharePoint

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
Alternate Path/Progression	Follows on from Intervention/Support. Programme Co-ordinator may recommend alternative programme Record of alternate path kept on LMS	- Full Name - Email address	Kept as evidence for any complaints or appeals	Duration of studies + 1 years	Automatic	Learner Administration System Emails
Governance	Any documentation for future analysis of data (no learner records stored)	- Summary of results per module - Programme review meeting documentation and minutes	For future analysis of programmes	Indefinitely (no learner data kept)	N/A	Learner Administration System

Some exceptions may apply to the above where Cenit College is also a controller of data, such as:

Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
ILM Learners	Learners availing of ILM programmes run via the college.	- Full Name - Email Address - Phone Number - Result - Course - Correspondence	ILM state we must retain learner information for a period of 3 years	3 Years	Automatic	Learner Administration System SharePoint Emails
PRINCE/SCRUM/AGILE/ACCA	Learners availing of these programmes run via the college.	- Full Name - Email Address - Phone Number - Result - Course - Correspondence	Kept as evidence for any complaints or appeals	Duration of studies + 1 years	Automatic	Learner Administration System SharePoint Emails

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Some exceptions may apply to the above when Cenit College act as a processor to their client, such as:

Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
DfE UK Bootcamp learners	Learners availing of the UK Bootcamp programme run via the college.	• Full legal name • Email address • Phone number • Registration Number(s) • Address (including postal code) • Gender • Date of Birth • National Insurance Number • Next of kin/emergency contact details • Financial information (including details of funding and fees paid and outstanding) • Previous educational details • Previous employment details • Details of disabilities (optional) and/or medical records (may be necessary for the application for reasonable accommodation)	DfE state we must retain learner information for a period of 2 years	Duration of studies + 2 years	Automatic	Learner Administration System SharePoint Emails

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Activity Area	Activity	Type of Data/Record	Reason for retaining	Retention Period	Disposition	System
		• Criminal Convictions (Required for some vendors/UK) • Ethnicity (Required for some vendors /UK) • Residency & citizenship details (Required for some vendors /UK) • Current employment information (Required for some vendors /UK) • Employment and Salary Information (Required for some vendors /UK) • Agreement to use visual images for marketing (Required for some vendors /UK) (Not mandatory)				
Pitman UK and Ireland Learners	Learners availing of Pitman programme run via the college.	• Full Name • Email Address • Phone Number • Result • Course • Correspondence	Pitman Training Group (PTG) state we must retain learner information for a period of 5 years	Duration of studies + 3 years	Automatic	Learner Administration System SharePoint Emails
Funded training learners (Ireland)	Learners that avail of courses run by the college where the entry route is via a funded training organisation (SOLAS, ETBs, ICTSkillnet)	• Full Name • Email Address • Phone Number • Result • Course • Correspondence	To ensure learners can return to the college for a transcript of studies and references as required.	Duration of studies + 1 years	Automatic	Learner Administration System SharePoint Emails



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Where the college is deemed as a processor of data, retention periods will be determined by the controller.

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1.11 Quality Assurance Information

Cenit College hosts a Quality section on its Management Information system. The primary access is given to the Quality Manager with the Managing Director, Director of HR, Organisational Development and Quality and the Director of IT, Systems and Compliance also having access. This information is not tracked systematically but a Quality Improvement Plan exists where the owner of the task is identified and assigned a task.

1.12 Monitoring of this policy

The Statement will be reviewed annually by the Board of Directors with consideration to changes in legislation, legal advice and where relevant new technologies. The Board of Directors, in conjunction with the Data Protection Manager (DPM) will on an annual basis:

- Review ongoing accuracy of the Statement.
- Review complaints, requests, withdrawals of consent
- Review audit outcomes
- Compliance with legislative changes with respect to the associated policies – subject access request policy, website / cookies policy, records retention policy, data protection policy.
- Approve the statement as required.

2 Version Control and classification

2.1 Version

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
1	20/01/2022	PW (QA)	New QA system/Policy creation
2	21/08/2023	KMCD	Removal of table and link to record of processing. To allow ease of updating the record of processing.
3	28/08/2023	BF (DPM)	General Review to ensure compliance
4	22/11/2023	JDC (Commsec)	General Review to ensure compliance, minor changes

2.2 Classification

**Use the information fields on MS word to auto update these fields.*

DOCUMENT CLASSIFICATION	Internal
PRINTING	Uncontrolled when printed
DOCUMENT REF	QA 8.2
VERSION	4
LAST APPROVAL DATE	28/11/2023

2.3 Distribution

NAME	TITLE
All Staff	QA8.2. Information Management V1
All Staff	QA8.2. Information Management V2
All Staff	QA8.2. Information Management V3
All Staff	QA8.2. Information Management V4

2.4 Approval

NAME	POSITION	SIGNATURE	DATE
Board of Directors	Board of Directors	VMCD/SM/KMCD/CG	11/10/2022
Board of Directors	Board of Directors	VMCD/SM/KMCD/CG	05/09/2023
Board of Directors	Board of Directors	VMCD/SM/KMCD/CG	28/11/2023