

ATHENA SWAN: PRIVACY NOTICE

WHAT DATA IS INCLUDED IN THIS PROJECT?

The Athena SWAN project involves collecting, analysing and reporting on data pertaining to Carlow College, St Patrick's (CCSP) staff, and HR policies and procedures.

WHAT ARE THE SOURCES OF STAFF DATA?

Data comes from a variety of sources:

- Desk exercises will be completed by the HR Office on data that it holds
- An online staff survey
- Interviews and focus groups will be conducted with staff.

WHO HAS ACCESS TO DATA?

A Self-Assessment Team (SAT) is carrying out the Athena SWAN project under the leadership of Helen Maher, Chair. The SAT is divided into small working groups which conduct specific parts of the project. Each working group has access to the data it requires to carry out its specific assigned tasks. Working groups do not share their data with each other unless authorised in advance in writing by the Chair. For project oversight and data verification purposes, a very small number of SAT members may have access to all project data. This is essential to ensure consistent decision making, and access to data is on a need to know basis.

External parties facilitate and act as the secretariat for focus groups. They have access to data commensurate with their duties. Appropriate contracts are in place to protect data.

HOW IS STAFF PRIVACY PROTECTED?

A range of measures are in place to protect staff privacy:

- All SAT members sign a non-disclosure and record keeping agreement
- All Advance HE panellists, who will adjudicate on CCSP's Award application, sign a non-disclosure agreement
- Only required data is given to and collected by the SAT and its constituent working groups. This includes that data which identifies individuals will not be collected or used if anonymous data is sufficient, and that any data which may identify individuals will be treated as anonymous
- Staff privacy is taken into consideration prior to the beginning of every stage of the project, and appropriate measures put in place. Deliberations and decisions are recorded in a Data Protection Impact Assessment
- Due to low staff numbers, the SAT excludes data which may pose an undue risk to staff privacy
- All records and data are stored and destroyed securely
- Some classes of information are subject to more stringent protocols. For example, the HR Office may share staff data temporarily with the HR Working Group for verification

purposes, however, it is taken back by the HR Office once the verification process is complete

- Data collected during interviews and focus groups is subject to clear written protocols, including informed consent by participants for data collection and use. Participants in interviews and focus groups will not be identified in the Award application. They also agree to keep the proceedings of focus groups and interviews confidential
- In general, staff are not named in the Athena SWAN application with the exception of: the President, who provides a letter of support for the Athena SWAN process; SAT members; and other staff members who have consented to being named e.g. in staff profiles included in the application
- Advance HE does not publish applications submitted by institutions. Some participating institutions have published their applications in full whereas others have elected either not to publish their applications or have published redacted versions. CCSP will decide on publication once the Athena SWAN process is complete, and the decision will take staff privacy into account.

HOW LONG IS DATA RETAINED FOR?

As this is the first time that CCSP has participated in the Athena SWAN process, it is difficult to make decisions at the outset about how long data needs to be retained for. Originally, CCSP intended to submit its award application in November 2020 but the COVID-19 pandemic has caused delays, and it is now intended to submit in June 2021. The process does not end at that point. An Action Plan must be implemented, and it is necessary to submit applications for renewal of Athena SWAN Awards every four years. Some data will need to be retained in order to progress these tasks.

Most project data will be retained until a decision has been communicated by Advance HE to CCSP on its application. However, some data will be deleted in the short-term e.g. if any directly identifying information is supplied in response to the online survey staff survey, it will be deleted or anonymised once the survey closes.

After Advance HE has communicated a decision on CCSP's 2021 Award application, an appraisal exercise will be conducted in consultation with the Data Protection Officer to determine which data requires to be retained. In general, retained data will be transferred from working groups to the Chair, SAT, for safekeeping. Raw HR data will remain in the custody of the HR Office.

SAT members are responsible for secure destruction of data in their custody.

HOW ARE RECORDS AND DATA STORED?

- Paper records will be stored in locked units
- Electronic records will be password-protected and stored within College systems
- Survey Monkey, based in the USA, is used to collect and initially store survey data. It has stringent data security mechanisms in place
- All records destruction will be carried out by secure means
- Documents are not printed unnecessarily
- Data is not stored on portable storage devices

IS MY PARTICIPATION REQUIRED?

Staff cooperation and engagement is essential to make this important project a success.

HR Office data will be used in desk exercises and it will be ensured that its use does not pose an undue risk to staff privacy. Participation in the online staff survey interviews and focus groups is optional. Staff choose what personal data they wish to disclose when participating in the survey, interviews and focus groups. Personal data may include special categories of personal data (e.g. health data).

LEGAL BASIS

The College must identify a relevant legal basis outlined in the General Data Protection Regulation (GDPR) when personal data is processed. Generally, the College utilises its legitimate interests in enquiring into and promoting gender equality, and recognition of its initiatives under the Athena SWAN Charter. Staff members are entitled to object to the use of their personal data where the legitimate interests basis is utilised, however, it is hoped that the information outlined here will provide assurance about the data security measures employed by the SAT. Staff members will be asked for their consent if it is necessary for any element of the process. An additional legal basis must be identified when special categories of personal data are processed. The College uses the substantial public interest basis for this purpose.

Staff who participate in focus groups sign informed consent forms regarding their participation. Consent in that context refers to agreement to participate rather than consent to process personal data. Focus group data is processed under the legitimate interests and substantial public interest bases.

HOW WILL FINDINGS ARISING FROM DATA ANALYSIS BE COMMUNICATED TO STAFF?

The application made by CCSP to Advance HE will be made available to all staff, as will a summary of the results of the staff survey.

WILL I RECEIVE FURTHER INFORMATION ABOUT HOW MY DATA IS BEING USED?

Yes. The information in this Privacy Notice has general application for personal data processing done throughout the Athena SWAN process. It will be developed and refined as the process takes shape. Additionally, privacy information relating to specific parts of the process may be made available discretely to staff. This refers particularly to interviews, focus groups and the online survey.

DATA PROTECTION RIGHTS

The GDPR gives individuals whose data is processed (data subjects) the following rights, which are subject to some exemptions:

- To request information about how we process your data
- To restrict data processing
- To object to data processing
- Data portability

- To access personal data we hold about you
- To request the rectification of incomplete or incorrect data
- To request the erasure of data
- Rights in relation to automated decision making and profiling

CONTACT US

Further information about the Athena SWAN process may be requested from Helen Maher, Chair, SAT, hmaher@carlowcollege.ie. If you would like to exercise your Data Protection rights or would further information about this Privacy Notice, please contact: Bernie Deasy, Data Protection Officer, bdeasy@carlowcollege.ie.

HOW TO MAKE A COMPLAINT

If you are unhappy with the way in which your personal data has been processed, we encourage you to contact us in the first instance. You have the right to complain to the Data Protection Commission at:

Data Protection Commission,
Canal House,
Station Road,
Portarlinton,
Co. Laois.
076-104800 / 1890 25 22 31
info@dataprotection.ie

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