

Privacy Notice: Equality, Diversity and Inclusion

Introduction

This Privacy Notice covers personal data processing for equality, diversity and inclusion (EDI) purposes at Carlow College, St Patrick's (CCSP). The EDI Team is responsible for advancement of EDI by promoting equality and countering discrimination in respect of the College community. This Privacy Notice principally refers to EDI Team activities, but in some instances, may refer to actions by or at the direction of the Head of HR & EDI given the dual remit of this role. The Privacy Notice covers the activities of the Athena SWAN Self-Assessment Team (SAT), which is a sub-group of the EDI Team responsible for overseeing Athena SWAN applications.

This is a high-level Privacy Notice in respect of EDI activities. Supplementary data privacy information regarding specific activities shall be provided, where necessary e.g. information about the management of survey results.

What personal data is involved? What are its sources?

EDI activities may involve collecting, analysing and reporting on data pertaining to College staff, and HR policies and procedures. The nature and source of staff data varies between activities. Usual sources are:

- Desk exercises completed by the HR Office on data that it holds
- Anonymous gender information is shared by HR with the EDI Team i.e. the number of staff who identify as a particular gender
- Staff surveys
- Interviews and focus groups conducted with staff.

Staff engagement with surveys, interviews and focus groups is optional. Staff choose what personal data they wish to disclose when participating in these activities. In some cases, special categories of personal data may be processed e.g. health information.

Who has access to staff data?

Access to data is commensurate with duties. For instance:

- All EDI Team members have access to meeting records of the (full) EDI Team
- Working groups comprising EDI Team members carry out specific projects and activities. Each working group has access to the data required to carry out assigned

tasks. Working groups do not share their data unless authorised in advance in writing by the Chair

- To facilitate oversight and consistent decision-making, EDI Officers (Chair, Secretary) may require access to working group data.

How is staff privacy protected?

A range of measures is in place and/or available to protect staff privacy. The deployed measures may vary depending on what is deemed necessary:

- All EDI Team members sign a non-disclosure and record keeping agreement, which includes, for instance, directions on storage, sharing and deletion
- Only required data is processed. This includes that data which identifies individuals will not be collected or used if anonymous data is sufficient
- If possible, data that identifies individuals is treated as anonymous
- Data privacy is taken into consideration from the beginning of each project or activity
- Due to relatively low staff numbers, data which may pose an undue risk to staff privacy may be excluded e.g. if there is a risk of an individual being identified
- Written outputs of the EDI Team are considered in respect of privacy prior to publication. Outputs may not be published, or redacted or summary versions may be made available
- Where HR carries out desk exercises on staff data that it holds, it normally makes statistical data available to the EDI Team.

Are findings of EDI initiatives communicated to staff?

Usually, yes, although to protect data privacy, it may be necessary to publish redacted or summary versions of documents.

Third-party processors

On occasion, external service providers may be used e.g. facilitators and note takers. Survey platforms that process data outside the European Economic Area (EEA) may be used. In all cases, suitable measures will be in place to protect data.

How long is data retained for?

The length of records retention varies according to activities, and will be advised separately, where required. In general, raw survey data is deleted once it has been analysed and a report generated; working group data is retained unless at least the conclusion and validation of activities. Some data may be retained between iterations of Athena SWAN applications for comparison purposes. Overall, the [records retention schedules](#) apply.

Legal basis

CCSP must identify a relevant legal basis outlined in the General Data Protection Regulation (GDPR) when personal data is processed. Generally, CCSP utilises its legitimate interests in enquiring into and promoting gender equality, and recognition of its initiatives under the Athena SWAN Charter. Consent will be requested, if necessary. Where consent is requested, it can be granted, refused or withdrawn. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. Substantial public interest or explicit consent may be relevant to processing of special categories of personal data.

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

Contact us

Further information about EDI activities may be requested from edi@carlowcollege.ie. If you would like to exercise your Data Protection rights or request further information about this Privacy Notice, please contact dataprotection@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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