

8. INFORMATION AND DATA MANAGEMENT

GDPR defines “personal data” as any information relating to an identified or identifiable natural person (“a data subject”). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

All data collated by Craol is done so under strict GDPR guidelines and in accordance with Craol’s Data Protection and Data Retention Policies. Information is gathered in order to ensure that best quality assurance practices are in place for staff and learners, to monitor and evaluate training and learning processes and to inform

any decisions regarding change or alteration of courses. For example, data collated by the Training and Quality Assurance Committee and the Academic Committee regarding all module and learner information is fed back through reports to the Coordination Committee, as per their terms of reference. Data kept and stored is done so accurately and where necessary kept up to date.

8.1 Management of Data

8.1.1 Trainers collect learner feedback forms and the information is collated and communicated to the Project Coordinator and the Academic Committee. This assists in the monitoring of delivery of modules and learners are informed during the induction period of the reasons for collecting data.

8.1.2 The Project Coordinator maintains a database of all modules delivered by individual stations. This tracks the names of trainers, access indicators, e.g. use of recognised prior learning in accessing a module, number of certified learners, dates of modules delivered and profile of learners. This is monitored on a regular basis and feeds into the ongoing quality assurance system of the organisation.

8.1.3 Forms are designed to reflect the vision and mission of the organisation and capture the following details:

- a. Personal data
- b. Learner/trainer feedback
- c. Complaints/Appeals
- d. Requests for recognition of prior learning.
- e. Requests for Special Considerations/Reasonable Adjustments
- f. Results
- g. Modules completed.
- h. Modules delivered.
- i. Requests for Information
- j. Site visit monitoring report

8.1.4 Key performance indicators relevant to learners are tracked and measured by collating some of the following data.

- a. Number of learners applying for individual modules.
- b. Numbers of learners completing individual modules.
- c. Profile of learners applying for individual modules.
- d. Number of learners dropping out of modules.
- e. Number of learners who receive QQI awards.
- f. Learner satisfaction/dissatisfaction with module delivery.
- g. Learners going on to become station volunteers, making programme and in administration and support.
- h. Number of learners availing of RPL and progressing to further training through the Craol Access, Transfer and Progression routes.

8.1.5 Key performance indicators relevant to trainers are tracked and measured by collating some of the following data.

- a. Adherence to health and safety guidelines regarding training room and equipment.
- b. Clear delivery of module contents
- c. Clear delivery of module outcome expectations.
- d. Clear delivery of assessment procedures
- e. Adequate materials
- f. Nomination of class rep
- g. Ethos of respect between trainer and learners
- h. Trainer attendance
- i. Knowledge and understanding of subject matter
- j. Strategies for facilitating learning
- k. Knowledge of use of technical equipment
- l. Submission of learner's course work within agreed time frame for Internal Verifier and External Authenticator
- m. Attendance at CPD and other relevant workshops or training.

Data relating to learners is collected by individual trainers and shared with the Academic Committee, the Project Coordinator and the Training and Quality Assurance Committee. Data relevant to site visits is collected by a member/s of the Training and Quality Assurance Committee or Project Coordinator and shared with the Academic Committee and relevant trainers. Original copies of forms/data relevant to learners are kept securely by the trainer until after award is achieved and certificates received.

8.2 Learner Information Systems

8.2.1 Data collected by Craol is used to improve the quality of training. As well as gathering data for the purposes of quality assurance and benchmarking existing training methods, the organisation also uses data to compile reports for the purposes of monitoring and evaluation and to improve delivery structures if necessary.

8.2.2 Data collected and stored by Craol is done so under GDPR Data Protection Principles which state that any personal data collected must be:

- a. Processed lawfully, fairly and in a transparent manner.
- b. Collected for specific, explicit and legitimate purposes.
- c. Be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- d. Be accurate and kept up to date.
- e. Kept in a form which permits identification of data subjects for no longer than is necessary.
- f. Be processed in a manner that ensures appropriate security of personal data.

8.2.3 Data subjects have the following rights:

- a. The right to be informed.
- b. The right of access.
- c. The right to rectification.
- d. The right to erasure (also known as the 'right to be forgotten').
- e. The right to restrict processing.
- f. The right to data portability.
- g. The right to object.
- h. Rights with respect to automated decision-making and profiling.

8.3 Management Information System

8.3.1 Craol does not have specific Management Information System software. The organisation uses forms which are designed to capture relevant information, collected by individual trainers and

forwarded to the Project Coordinator. Electronic forms and correspondence containing personal data are password protected. Hard copies are stored by individual trainers and the Project Coordinate in a secure cabinet. The organisation also uses Excel and Dropbox to store reports and Survey Monkey to collect GDPR consent from learners. These can only be accessed by the Project Coordinate.

8.3.2 This data is used to upload Learners details and results to the QQI QBS system for certification purposes. It is also used to inform the organisation of the following, including but not limited to, numbers of learners, awards achieved and learner satisfaction. Data is reviewed regularly to provide insight for future planning of training and to inform the quality assurance system.

8.4 Records maintenance and retention

8.4.1 In accordance with GDPR legislation and Craol Data Protection and Data Retention Policies, data is stored securely in a locked cabinet or on the Craol or Craol station database and only kept for the time indicated in the Data Retention Policy. Data subjects may request their information by completing the contact form on the Craol website: craol.ie.

Fig 15 Craol Data Retention Template for Learner Admissions

Learner Admissions

Data type	Retention Policy	Elimination Process
Queries of interest in modules Name and contact details of querist.	3 months.	Information is deleted at station level and Craol level if applicable.
Learner application information, for applicants who have not followed up or not been awarded a place. Name of prospective learner, contact details (postal and email address, telephone number), gender, reasonable adjustment data (where applicable.)	3 months after application.	Information is anonymised for evaluation and monitoring purposes. Identifying details are confidentially deleted at station level.
Learner application/admission information, for applicants who registered and completed a module. Name of prospective learner, contact details (postal and email address, telephone number), gender, reasonable adjustment data, information regarding previous employment or study, i.e. in the case of an application for Recognised Prior Learning.	6 months after certification or leaving the module.	Information is anonymised for evaluation and monitoring purposes. Identifying details are deleted or electronically removed from the Craol data base and at station level.
Records of course fees, invoices, receipts of payments received.	7 years as per financial legislation.	Information is anonymised for secure archiving. Identifying details are confidentially shredded/or electronically removed from the Craol data base.
Student health and welfare Records in relation to Reasonable adjustments/Special Consideration applications.	6 months after certification or leaving the module.	Information is anonymised for evaluation and monitoring purposes. Identifying details are deleted at station level and the Craol data base.