



HCT Learning

Quality Assurance Manual

2020

Information and Data Management

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1 Information and Data Management

HCT Learning has a quality assurance system in place, in order to maintain its academic integrity, and to ensure quality education and training, research, and related activity. An essential component of this quality assurance system is HCT Learning's own internal web application – MyHCT.

Developed in 2014 MyHCT is a custom-built product used to manage business operations. The data is securely stored on a database, using scripting language in order to access, manage and process data. All data is securely stored on a dedicated server using the 3 to 1 rule. All data on the server is encrypted and the web application is protected by Firewall with daily updates and a cloud based WAF to prevent website hacks and DDoS attacks. The data is backed up every 12 hours as part of a Disaster Recovery(DR) plan, allowing the business to quickly restore data after a disaster. It is regularly updated to meet the needs of HCT Learnings staff, clients, learners and trainers.

MyHCT has been built on the core foundation of facilitating quality control across its usership and thus provides details of company and QQI policy and relevant programme information. This web application aids HCT Learning in meeting its quality assurance policies and requirements. One of the primary ways it aids HCT and QQI in maintaining quality assurance is in the collection and provision of data, this is collected in accordance with GDPR regulations. MyHCT is capable of storing, tracking, and updating information regarding HCT Learning's clients, trainers, programmes, and learners. In addition, it facilitates the collection of information for data analysis of quality which is essential for programme planning, design, delivery, monitoring and review purposes.

MyHCT is accessible by trainers, HCT Learning personnel, clients and appointed External Authenticators. Access to the web application has restricted, password protected access meeting global security encryption standards. Access to personal protected information requires an extra password to be viewed – this is only made available to authorised personnel. A robust admin account exists to access the website back end. There are stringent procedures for managing the issuing of and removal of user access rights are established.

1.1.1 MyHCT Users

HCT Learning has developed their web application to allow for multi-level user access for a range of purposes including management, programme coordinators, administrators, trainers and clients. Each level has been purposely built and tailored for the individual using it to be helpful and user friendly.

By doing this HCT Learning has also ensured that unauthorised users are unable to obtain access to information for which they lack authorisation.

1.1.2 MyHCT Web Application/www.hctlearning.ie

HCT Learning has developed a link between our web application and our website. As a result it allows our centre the capacity to keep elements of our website live and current in order to keep visitors to our website updated on our centres current position. This would include programmes that have been scheduled for delivery, statistical information including grade analysis, annual feedback and summary of programmes and published reports to include self-evaluation plan, programme improvement plans, programme review and monitoring reports.

1.1.3 MyHCT Main Page Set Up

HCT Learning stores relevant and required information on our web application. Information is gathered from trainers, clients and learners in order to set up a programme and for certification from QQI. This information is password protected on the web application, 2 encrypted passwords are required to view personnel protected information. Below will outline the different information we collect and why we need to collect this information. All information is collected and stored in accordance with GDPR regulations. Learners dates of birth will be automatically deleted once no longer required, after a six-month period or also upon request from the individual.

Client Information: MyHCT holds client personal information, such as contact details, training scopes, budgets and estimated numbers of potential learners that could avail of training as well as correspondence between HCT Learning and its clients. In addition it also holds general information relevant to the prospective, current, and former planning and delivery of courses. This information gathered allows us to ensure our centre is aligned with our business objectives and target learner audience.

Trainer Information: MyHCT stores HCT Learning's trainers' relevant personal information (such as contact details), programmes which they are qualified to deliver under our portfolio of programmes offered, programmes they have delivered in the past, correspondence (between HCT Learning and the trainer) and the trainer profile. This includes their training, qualifications and history with HCT Learning. HCT learning can set up or deactivate the trainers portal. It also allows access to the trainer's calendar which is interlinked to the trainers personal portal. This calendar communicates

the trainer's schedule. It can be updated by both the centre and the trainers and communicates dates not available - due to working elsewhere, holidays, attendance of programme development or review days, dates working for HCT Learning with direct link to programme when clicking on the dates.

Programme Information: MyHCT has been developed to allow HCT Learning manage all QQI agreed QA programme requirements. MyHCT stores and tracks programme development from concept, to initial interest, to completion. In addition it stores information about all ongoing and completed programmes, along with the ability to send all standardised communication regarding the programme that is being scheduled, delivered or certified. Each programme has its own programme information page that tracks programme development ensuring all QA obligations have been met including a to do list and history of the programme for all staff involved in programme planning, delivery certification and monitoring. The data allows key statistical analysis to be carried out, facilitating the close monitoring and review of all HCT Learning's programmes.

Learner Information: MyHCT collects information relating to HCT Learning's enrolled learners. This information includes programmes which the learner has attended, results achieved, and assessments which have been received by HCT Learning. MyHCT has been designed to allow us to search under programme name, along with the year attended and will provide us with a list of learners who booked onto that specific programme that year. Protected by an additional password, the results of this search provide information such as name, personal contact details, programme attended, assessment submitted, results and grade achieved. Learners progression of programmes completed is logged in this section of our web application in order to identify the number of learners that are continuing their education experiences.

Certification Information: MyHCT stores information regarding all aspects of the certification process, including programme planning, key dates, assessments received and the whole internal verification process. MyHCT allows us to track and monitor each submission for certification. This involves the provision of data relating to learner participation in the course including – the number of learners originally booked, those who were present at registration, those who dropped out, those who did not attend certain days and those who have or have not submitted certain assignments.

Staff Information: Each permanent staff member working for HCT Learning will be provided with their own username and password which will allow them entry to their granted level of access.

MyHCT has been personalised for each staff member to communicate their responsibilities in relation to programme planning, delivery and certification. Prompts for actions required are communicated to staff through their own login page and actions tracked. It also stores on staff, staff management, time keeping and attendance. This can only be viewed by management and that staff member. This facilitates the maintenance of quality assurance by identifying any issues that may arise regarding staff and allowing opportunity for improvements to be made.

1.2 Self-Evaluation, Monitoring and Review through MyHCT

My HCT has the capacity to self-generate reports based on data inputted to MyHCT. These reports allow HCT Learning to evaluate, monitor, and review HCT Learning's activities and programmes. The reporting system has become a key performance indicator for HCT Learning, facilitating the tracking, monitoring, and analysis of the business in a very efficient manner. Data analysis can be gathered at the touch of a button and generates clear concise information. The system itself is updated and monitored daily by its users. HCT Learning has developed a Red Flag system that will monitor our programmes and services, where the threshold is set at 70%. Failure in any category will trigger a non-compliance and an automatic corrective action response will be required. Any improvements or feedback is acted upon and communicated during our quarterly Academic Council Meeting.

1.2.1 Report Generation System

HCT Learning has devised a range of reporting mechanisms that allow for the identification of areas where planning is required. This allows us to track, monitor, and evaluate our programmes. From the vast amount of data collected and detailed above, MyHCT is capable of generating reports.

KPI's: Management reviews KPI's on a weekly bases in a variety of areas to do with the business including staff performance, programme status, programmes changes or cancelations, number of learners attending, financial affairs, certification progression, programme performance, feedback, academic standards being achieved and operational requirements. Information will be discussed with the managing director and relevant staff and will be brought forward for discussion on findings during Rap and Academic Council meetings.

1.2.2 Company Reports

Administrator Weekly Report: The purpose of this report is to remind the administrator of activities required to be completed. It has been set within the centres agreed timeframes and the report is also set to identify if policies are not being followed through. The report is broken down daily to show all tasks required within that week. It communicates information regarding actions that need to be taken by the administrator. This includes pre-client calls to be completed, packs to go out for up-coming courses, mid-programme client feedback due, sign in and registration sheets due, assessments outstanding and programmes which need to be uploaded to QBS.

Programme Coordinators Weekly Report: The purpose of this report is to remind the programme coordinators of activities required to be completed. It has been set within the centres agreed timeframes and the report is also set to identify if policies are not being followed through. The report is broken down daily, weekly and monthly. It communicates information regarding actions that need to be taken by the programme coordinator. This includes programmes to be networked, pre-programme client information to be completed, booking forms that need to be sent, booking forms that are required for processing and end client feedback that needs to be completed.

Programme Status Report: This report allows us to track the number of programmes that are being scheduled throughout the course of the year and allows staff and management to ensure all programme planning requirements are being met by tracking programme from interest to complete.

Course Summary – Persons/County – The course summary report allows us to analyse trends throughout years, months, programmes and locations. The point of this report is to prepare for forward planning, identify areas of work needed as well as highlight areas of growth.

Contact Summary Report: This report has been designed to provide the centre with the total number of clients we have access to on MyHCT and the programme coordinator who has been assigned to look after them. The point of this report is to monitor our client based ensuring that we have enough resources in order to facilitate the potential training opportunity.

Course Index Confirmation Log: A Course Index Confirmation Log will be developed for all programmes booked in. This will monitor the progress of the programme ensuring that all obligations are being met during the programme duration, if they are not it will trigger a red flag upon completion.

Packs Printed Monthly Report: This report allows us to track the programmes we have coming up along with log of programme packs we have sent to each trainer. This is to ensure that a trainer receives the correct programme paperwork required as well as the capacity to trace the security of assessment and paperwork.

Annual Attendance Report: This report analysis attendance on a programmes so that we can see if a particular programme has more drop outs or attended but not submitted, based on numbers that booked, started and completed from the total number of programmes ran. This report has a function to search programme via the trainer that delivered the programme or programme by name, which will allow us to review the programmes and trainers performance with a view that where poor completion or attendance of learners on a programme is flagged and will promote investigation.

Cancelled Programme Report: This report has been designed to allow us to review programmes we have cancelled or dates changed during the recruitment of learners onto our programme. In any given month or year HCT Learning can access information regarding the number of programmes worked on, the number of programmes that were delivered, and the number of programmes lost or changed. This allows us to identify where time is being lost, but also provide us with information on the estimated and actual programmes booked each month.

1.2.3 Feedback Reports

Annual Feedback Report: This report provides feedback and programme satisfaction rates from our clients, trainers and learners. It allows HCT Learning to identify how satisfied learners, trainers and clients are in relation to the programmes and services offered. As a result, HCT Learning can identify potential areas of improvement, as well as highlight our areas of strength.

Trainers Feedback Report: This report allows us to track trainers feedback relating to each of the programmes a trainer delivers. This allows us to monitor and review the trainers performance and if required take action. The report allows the user to search for the feedback report by the programme name and the year it was delivered. Once the report has been generated the following information will be accessible: the number of programmes ran, the number of trainers involved, clients and learners feedback forms which were completed, the number of learners booked, started and certified, grades achieved and feedback achieved from that programme broken into the trainer that has delivered it.

Red Flag System Report: The Red Flag system report has been designed to currently monitor eleven identified areas, however will continue to develop through reflection and monitoring of programmes as we identify more opportunities for growth. The purpose of the Red Flag system is to trigger an automatic correction response where it detects non-compliance or where a system target has not been met. The Red Flag system will operate at a status of open and closed and will be investigated by the Quality and Monitoring Committee and presented during the Academic Council meeting.

1.2.4 Certification Reports

Certification Report –Groups Summary: For each submission initiated into the certification process a number of reports are generated. The Certification Report – Group Summary is a summary of all the reports generated as part of our internal verification process and is used to monitor and reflect the findings every 2 months. This report is given to the External Authenticator to use during their visit and is reviewed and signed off by management once the report has been completed. The final report is used during the RAP meeting in order to identify action points which may need to be implemented and to conduct ongoing monitoring and evaluation.

The report includes the following information:

- Date the document was printed
- Programme Name - the name of the total groups being presented
- Number of groups - this is the number of groups that are being submitted for this certification period
- Number of learners booked onto the programme
- Number of non-starters - these are learners that didn't register on the programme
- Number who attended the last day
- Number of dropouts - the number of learners that started the programme but did not complete it
- Number of learners who submitted assessments, whether this was a partial or full submission
- Number of learners whose assessment submission was late
- Number of learners that attended the programme but did not submit any assessments
- Number of learners that have been made dormant due to non-submission of assessment
- Number of learners to receive certification
- Number of trainers that were involved in the delivery of the programmes for this submission

- Number of groups that are being submitted and their personal individual code that the centre has generated
- Name of administrator who has checked the information in this report and compiled the groups for the submission
- Major award code that these groups have been registered under. This is automatically generated from MyHCT
- The certification period these learners have been registered for
- Assessment break down
- List of trainers involved
- Feedback for programmes
- Total number of Reasonable Requests of Accommodation (RRA)
- Learner Skills Competency Log
- Group Work Verification Log
- Reasonable Request of Accommodation (RRA) Break down

Certification Progression Report: This report has been designed as part of our programme planning for certification. It indicates the estimated learners expected and the number of programmes delivered within a chosen certification process. It allows our centre to track the progression of a programme once confirmed through to the learners being certified. The report includes the following information.

- Start date/end date
- QBS upload
- Assessment deadline
- Number of learners booked
- Attendance tracker which tracks the submission of attendance sheets from the trainers
- Assessment Verification Log completed and ready for our internal verification processes
- Measures the progression of our submission procedures from Pedagogical Reviewers Report, Internal Verification Checklist, Internal Verification Report to group ready for submission (report)
- End trainer, end client, end participants feedback forms have been completed and submitted to MyHCT

Certification Report – Group Total: Similar to the certification progression report, however with more focus on the number of learners that will be going forward for a particular submission cycle rather than the number of programmes delivered for a submission. This report is broken down with the QBS Code, the programme delivered, its end date, number of learners that were booked, are invalid and needs to be work on for the submission, the number of learners submitted, postponed and present on the last day. This programme report will provide us with the number of assessments received, photographic evidence submitted and total number of learners going forward in which will be matched with QQIs QBS System before final submission is processed.

Certification Report – Learners: This report is accessible by authorised users only and provides a report based on the learners that have been certified through a particular submission cycle. The point of the report is that it sorts the following information:

- Learners name
- Programme attended
- QBS code learner is registered to
- Assessment received
- Results/grade
- Client the learner is attached to
- Contact number and email address

Certification Results and Paid for Report: HCT Learning has a policy of payment for a programme 30 days after completion. As a result, once the final results have been submitted to QQI for processing, HCT Learning will be required to send results out to clients/learners or send payment reminders if payment hasn't been received. This report tracks learner's results letters and certifications received in relation to the tracking dates the centre sent information out. MyHCT generates an automatic result letter to ensure information that is being received is standardised and uniformed and will provide the person receiving the information with a range of relevant policies. HCT Learning has a policy that learners will not receive results or certificates for the programme they have attended until payment for the programme has been made. This report also communicates to all staff working in HCT Learning with the progression of qualification documentation processes after the final submission cycle has been completed. This report is monitored and updated weekly between final results and receipt of certification and is then monitored monthly.

QBS Code Report: This report sorts and forecasts the next QBS code to be generated for a group required to be uploaded to QBS.

Invalid Learner Report: This report traces the number of learner's who achieved certification annually against the number of learners who were invalid and the reason why these learners were invalid. The purpose of this report is to highlight areas where improvements can be made in order to save time.

Summary of Programmes – Years Certified: This report details the total number of programmes delivered in a given year, the break down against the specific course ran, the total number of learners booked, those who registered, those who attended the last day, and those who submitted assessments. This report also analyses the number of learners that didn't start, those who dropped out during the programme, and those who attended but did not submit their assessments. In summary, this report is an overview of all activity relating to programme delivery in a given year.

Working Sector Report: Broken into the year the programme was delivered and the minor award associated with it, this report has been designed to identify the number of programmes ran throughout a year, the total of number of learners booked, registered and certificated along with highlighting their previous work experience and or highest level of education received. This report allows us to monitor that we are ensuring the correct learners are being accepted onto our programmes based on their previous experience and qualifications.

Scheme – Learners – Sector Report: As we offer a large volume of community based training programmes, we have developed a report that allows us to identify a range of valuable information including the number of clients contained on MyHCT, potential learners available to training programmes and a break-down of their working sector. This allows us to identify possible growth and to develop future programmes to be brought to the Academic Council meetings for discussion. The report also generates the number of programmes which have been delivered that year, the number of learners certified, and the working sector in which each of the learners may be coming from. If there is a significant disconnect between the original working sector and the chosen course type then this may indicate some issues with regards to the advertising of the course, the clients ability to match learners to the programme, or the accuracy of the information provided regarding the course, to name a few. Based on this data, HCT Learning may look at developing programmes which relate better to the original working sector of the learners.

Grade Analysis Report: This report reviews the grades achieved by learners within a specific minor award that we offer. Broken into year and programme name, the report details the total number of programmes ran, learners submitted for certification and results achieved. This report allows us to ensure that fair and consistent marks are being achieved. It will also allow us to action any problematic areas. This information is reviewed on an ongoing basis and is brought forward for Academic Council meetings. This report is also accessible to the public through our website.

Annual Extension Request and Repeat of Assessment Report: This report will monitor the number of extensions requested including the number of learners that have requested it. It will also track the number of learners that are repeating assessment activities and the reason for this. It is broken down into programme sector, the trainer that delivered the programme, their programme coordinator and total programmes delivered within that sector. The extension will be broken into the type of extension requested, the number of extensions granted/numbers declined. HCT will monitor the number of requests made to ensure that our admission and support criteria are in line with assessment criteria requirements. It will allow the centre to review its policies to ensure that the communication of our deadlines is being achieved.

Whole Learner Progression Report: This report will record how many programmes at HCT Learning a learner has attended, allowing us to track progression. It will show for example, 1000 learners attended one programme, 200 attended two programmes and 100 learners attended three programmes.

Reasonable Request of Accommodation (RRA) Report: The RRA Report refers to the number of learners that have required any reasonable accommodation on our programmes. HCT Learning engages in a number of manual based programmes and as a result we find that we can have a large volume of learners requiring accommodation on our programmes. This report identifies the number of programmes ran, and the total number of RRA requested within each of those programmes.

Changes of Learner's Group Report: This report has been specifically designed to track the number of programmes ran within the chosen minor award over the duration of the year, the total number of changes in relation to the submissions that took place over that year, and the total number of changes per programme. In addition this report will detail any appeals that took place, assessments that were late, the granting of compassionate consideration and the postponement (and final submission date) of any assessments. This information is used to ensure we are taking a fair and

consistent approach when we are required to make a change to a group regarding learner's assessments.

Programme for External Assessment: This report logs the programmes we have validation to run, the last date this programme was externally authenticated, the name of the last External Authenticator and the next date required for the programmes to be externally authenticated. This report also allows us, once the programme has been identified to be externally authenticated during a submission cycle. HCT Learning staff can select the programme, which will then generate a report/email that can be sent to the External Authenticator chosen, along with a contract of agreement for them to sign to say they understand our centres external authentication practices.

1.2.5 Financial Reports

Cost Analysis Report 2: This report is only accessible by authorised users and provides the financial and operational break down of each programme we offer. The report has been designed to provide the authorised person with a range of information including programme name, numbers of learners who booked onto the programme, trainer cost, room or material cost associated with the programme, estimated printing cost, assessment marking cost and postal/courier charges for that programme. The report will also provide the person with the estimated profit for the programme.

Programme Profit/Loss Report: Similar to the Cost Analysis Report 2 this report has been designed to look at the programmes as a whole rather than an individual programme. The report has been designed to provide the authorised person with a range of information including programme name, total numbers of learners who booked onto the programme, total number of programmes ran, total trainer cost, room or material cost associated with the programme, estimated printing cost, assessment marking cost and postal/courier charges for that programme. The report will also provide the person with the estimated profit for the programme.

Outgoing Payments: Broken into the weeks of the year, this report will allow the centre to budget company outgoings to ensure the correct allocation and monies owed have been made for each programme delivered. This report is available to authorised personnel only and will track payments made and materials or room hire budget allocation and monies owed that week.

1.3 Information Databases outside of MyHCT

Throughout the running of the business HCT Learning engage with some third-party sites. These are used for storing information, management of staff and accounts, for certification from QQI and portals for clients and trainers to access programme information. In addition to this some data is not stored online. We retain hard copies of registration forms containing personal information from learners, photo identification if required and their assessments. These are stored in a secure locked cabinet for six months after the certification date. It will then be shredded. Below outline the different third-party sites we engage with including why we use them and the information collected or stored by them.

File Storage, Backup and Recovery

HCT Learning operate from Microsoft 365 Business package and SharePoint. All documents that are related to the company are stored on these shared files. These documents could include programme packs, marketing material, and QQI Validation material. All files are protected and backed up twice per day to our shared files system. This includes:

- Antivirus
- Email encryption
- Document encryption
- Secure Logins with Multi Factor security
- Technical support

This system is GDPR and ISO27001 compliant. As a result HCT Learning is prepared that if in the case of an emergency where information has not been stored correctly or lost, we are in a position to restore our information quickly and simply. All staff with the required user names and passwords are able to access documentations through the team folder.

HRonline

Along with our own customised information system HCT Learning also works in partnership with Peninsula who specialise in human resources (HR) and employment law. HCT Learning has outsourced all HR solutions to Peninsula who have implemented all document control and policy in relation to legislative requirements. Management and staff have access to HRonline which tracks holiday, sick leave, timekeeping, and the personal information of HCT Learning's permanent staff, aswell as providing reporting solutions for the above headings. HR online also details HR development procedures and guidelines which aid management in ensuring these procedures are followed and staff are informed in relation to their rights.

Personal Data Not Stored Online

In addition to the online storage of HCT Learning's data, HCT Learning also require hardcopy documentation to be gathered. This documentation is generally a part of our programme recruitment, entry and accreditation requirements. Examples of this type of data include:

- Registration forms which contain information such as full name, PPS, date of birth, gender, contact details, education and career history
- Photo identification
- Learners assessment

All hardcopy information will be stored in a locked and secure location in HCT Learning's offices, and once information has been updated to MyHCT and/or is no longer required, it will be disposed of through an outsource document destruction service company. These procedures comply with all legislation requirements, ensuring that our client, employee, and learner information is kept confidential and secure at all times.

SAGE

HCT Learning has invested in an accountancy package in order for us to complete our end of year accounts. This is the cloud version of the package. As a result clients/learners contact details, programme delivered and monies spent are inputted into this system and elements of information are required to be send to our accountant at the end of the year in order to complete our end of year accounts. Sage is secure and only available on one computer within the office and has password protection to ensure that information is kept safe. This is GDPR and ISO27001 compliant. Due to being used on the cloud version it has:

- Backed up twice per day
- Secure Logins with Multi Factor security
- Technical support

QQI

HCT Learning will have information regarding programmes that are being offered and certificated under QQI. As a result HCT Learning will keep QQI updated on the programmes and awards that are being offered by HCT as they are obliged by legislation to keep an updated database of all QQI validated programmes/awards.

1.4 Portals on MyHCT

Below outlines the different portals on MyHCT, who accesses them and the functions they serve.

1.4.1 Trainers Portal

HCT Learning has designed a trainers portal for each trainer involved in the delivery and assessment of our learners. The trainers portal has been designed to communicate information to trainers delivering our programmes to ensure they understand their responsibility and to support them in their understanding of the QQI delivery and assessment expectations of each programme. Each trainer is provided with their own personalised username and password that only the trainer and authorised personnel at HCT Learning will have access to.

1.4.2 Clients Portal

HCT Learning has developed a client's portal for our clients to have access to important programme related documentation and to interlink with MyHCT. Each time a client books a programme they will be sent a username and password to log into the clients portal. This will then allow them to access personal information regarding the programme they are attending. This will also allow them to upload learner information safely and securely. Information on the learner includes work/life experience, highest level of education and possible support systems we may need to implement.

1.4.3 External Authenticators Portal

During the submission cycle an External Authenticator is selected to authenticate assessments. They will have access to these programmes through the EA portal. We will provide them with a password to access this portal.

1.5 Data Protection and Freedom of Information/GDPR

HCT Learning fully complies with all Data Protection Acts and ensures that all information collected on staff, trainers, clients and learners are used only for the purpose they have been originally collected. HCT Learning will ensure that their staff are fully trained in HCT Learning's policies regarding data protection. In addition, it will ensure that all staff members understand the terminology and requirements laid out under the Data Protection Act and that they understand their responsibilities in upholding these requirements.

1.5.1 Data Protection Policy

This document is provided in accordance with the Data Protection Act of 1998, and from the 25 May 2018, the EU General Data Protection Regulation 2016/679 (the GDPR) in relation to data protection. Clients are invited to read this policy on why and how we use your data and contact the office directly if they have any further questions.

Under GDPR guidelines HCT Learning agrees to the following:

- Obtain and process any collected and stored information fairly
- Keep data only for one or more specified and lawful purpose
- Use collected data only in ways which are compatible with the purposes for which the initial request was made
- Keep collected and stored data safe and secure
- Keep data accurate and up-to-date
- Ensure that the data collected is adequate, relevant and not excessive
- Retain data no longer than is necessary for the specified purpose or purposes
- Give a copy of their personal data, the reason it is being held, and a list of who has access to it, to any individual, upon written request

HCT Learning stores data both online and in hard copy. There is an internal web application to store all staff, client, trainer, learner and programme details. This system is called MyHCT. All the information contained on MyHCT is protected by the use of a secure log-in system. All members of staff have an individual password in order to login to the system. Access to personal protected information such as PPSN and DOB requires an extra password, therefore only users with permission can obtain the key information required. Our system has restricted, password protected access and meets global security encryption standards using a secure way of encrypting information. All hard copy assessment material is securely stored in a locked filing cabinet. These are destroyed six months after the certification period.

Disclosure to Third Parties

HCT Learning at times may be required to disclose information to third parties. HCT Learning specialises in offering part-time educational opportunities within the community, therefore much of the funding for its programmes arises from Community Employment Schemes. As a result, HCT Learning's learner data may arise, in part, from these types of third parties. This type of data can include personal details (names, PPS numbers and dates of birth), reasonable accommodation requirements, past education and work experience. HCT Learning in turn passes data such as

assessment results and attendance back to the third parties. In order to certify a learner we need to share information with QQI. This data may include the full name, PPS number, date of birth, gender and photo identification of the learner. Photographic and video evidence generated as part of assessment on a programme may be shared with an External Authenticator for authentication of results as part of the certification process. HCT Learning has invested in an accountancy package (Sage), in order for us to complete our end of year accounts. As a result clients/learners contact details, programmes delivered and monies spent are inputted into this system. Some elements of this information will be required to be sent to our accountant at the end of the year in order to complete our end of year accounts. Sage is secure and only available on one computer within the office and has password protection to ensure that information is kept safe. The data sharing platforms which are used vary between third parties, each of which have highly secure password protected applications.

The Right To Be Informed

In order to keep clients/learners informed about how we use your data, the Data Protection Acts are live on our website. Learners will be informed in the information booklets and during induction. If anything changes we will contact the learner directly to inform them.

Provided to learners

You have the right to know the following information:

- the types of data we hold and the reason for processing the data
- our legitimate interest for processing it
- details of who your data is disclosed to and why
- how long we keep your data for, or how we determine how long to keep your data for
- where your data comes from
- your rights as a data subject
- your absolute right to withdraw consent for processing data where consent has been provided and no other lawful reason for processing your data applies
- your right to make a complaint to the Data Protection Commission if you think your rights have been breached
- whether we use automated decision making and if so, how the decisions are made, what this means for you and what could happen as a result of the process
- the name and contact details of our point of contact for data protection

The Right To Access

You have the right to access your personal data which is held by us. You can find out more about how to request access to your data by reading our Subject Access Request policy.

The Right To 'Correction'

If you discover that the data we hold about you is incorrect or incomplete, you have the right to have the data corrected. If you wish to have your data corrected, you should complete the Data Access Request Form which is located on the website or you can call the office.

Usually, we will comply with a request to rectify data within one month unless the request is particularly complex, in which case we may write to you to inform you that we require an extension to the normal timescale. The maximum extension period is two months.

You will be informed if we decide not to take any action as a result of the request. In these circumstances, you are entitled to complain to the Data Protection Commission and have access to a judicial remedy.

Third parties to whom the data was disclosed will be informed of the rectification.

The Right To 'Erasure'

In certain circumstances, we are required to delete the data we hold on you. Those circumstances are:

- where it is no longer necessary for us to keep the data
- where we relied on your consent to process the data and you subsequently withdrew that consent. Where this happens, we will consider whether another legal basis applies to our continued use of your data
- where you object to the processing (see below) and the company has no legitimate interest to continue the processing
- where we have unlawfully processed your data
- where we are required by law to erase the data

If you wish to make a request for data deletion, you should complete the Data Access Request Form which is located on the website or you can call the office.

We will consider each request individually, however, you must be aware that processing may continue under one of the permissible reasons. Where this happens, you will be informed of the continued use of your data and the reason for this.

Third parties to whom the data was disclosed will be informed of the erasure where possible unless to do so will cause a disproportionate effect on us.

The Right To 'Restriction'

You have the right to restrict the processing of your data in certain circumstances.

We will be required to restrict the processing of your personal data in the following circumstances:

- where you tell us that the data it holds on you is not accurate. Where this is the case, we will stop processing the data until it has taken steps to ensure that the data is accurate
- where the data is processed for the performance of a public interest task or because of our legitimate interests and you have objected to the processing of data. In these circumstances, the processing may be restricted whilst we consider whether our legitimate interests mean it is appropriate to continue to process it
- when the data has been processed unlawfully
- where we no longer need to process the data but you need the data in relation to a legal claim.

If you wish to make a request for data restriction, you should complete the Data Access Request Form which is located on the website or you can call the office.

Where data processing is restricted, we will continue to hold the data but will not process it unless you consent to the processing or processing is required in relation to a legal claim.

Where the data to be restricted has been shared with third parties, we will inform those third parties of the restriction where possible unless to do so will cause a disproportionate effect on us.

You will be informed before any restriction is lifted.

The Right To Data 'Portability'

You have the right to obtain the data that we process on you and transfer it to another party. Where our technology permits, we will transfer the data directly to the other party.

Data which may be transferred is data which:

- you have provided to us; and
- is processed because you have provided your consent or because it is needed to perform the contract between us; and
- is processed by automated means

If you wish to exercise this right, please contact HCT Learning to speak with the point of contact for data protection.

We will respond to a portability request without undue delay, and within one month at the latest unless the request is complex or we receive a number of requests in which case we may write to you to inform you that we require an extension and reasons for this. The maximum extension period is 2 months.

We will not charge you for access to your data for this purpose.

You will be informed if we decide not to take any action as a result of the request, for example, because the data you wish to transfer does not meet the above criteria. In these circumstances, you are able to complain to the Data Protection Commission and have access to a judicial remedy.

The right to data portability relates only to data defined as above. You should be aware that this differs from the data which is accessible via a Subject Access Request.

The Right To 'Object'

You have a right to require us to stop processing your data; this is known as data objection.

You may object to processing where it is carried out:

- in relation to the company's legitimate interests
- for the performance of a task in the public interest
- in the exercise of official authority; or
- for profiling purposes

If you wish to object, you should do so by completing the Data Access Request Form which is located on the website or you can call the office.

In some circumstances we will continue to process the data you have objected to. This may occur when:

- we can demonstrate compelling legitimate reasons for the processing which are believed to be more important than your rights; or
- the processing is required in relation to legal claims made by, or against, us.

If the response to your request is that we will take no action, you will be informed of the reasons.

Right Not To Have An Automated Decision Made About You

You have the right not to have decisions made about you solely on the basis of automated decision making processes where there is no human intervention, where such decisions will have a significant effect on you.

However, HCT Learning does not make any decisions based on such processes.

We may carry out automated decision making with no human intervention in the following circumstances:

- when it is needed for entering into or the carrying out of a contract with you
- when the process is permitted by law
- when you have given explicit consent

In circumstances where we use special category data, for example, data about your health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership the company will ensure that one of the following applies to the processing:

- you have given your explicit consent to the processing; or
- the processing is necessary for reasons of substantial public interest

1.5.2 Data Breach Notification Policy

A) Aim

We are aware of the obligations placed on us by the General Data Protection Regulation (GDPR) in relation to processing data lawfully and to ensure it is kept securely.

One such obligation is to report a breach of personal data in certain circumstances and this policy sets out our position on reporting data breaches.

B) Personal Data Breach

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or processed.

The following are examples of data breaches:

- access by an unauthorised third party
- deliberate or accidental action (or inaction) by a data controller or data processor
- sending personal data to an incorrect recipient
- computing devices containing personal data being lost or stolen

- alteration of personal data without permission
- loss of availability of personal data

C) Breach detection Measures

We have implemented the following measures to assist us in detecting a personal data breach:

- Employees shall be trained to recognise such breaches and regular staff awareness training will be provided.
- We shall understand the data access of **ALL** users within the organization and regularly monitor whether the data access is appropriate for a specific user.

D) Investigation Into Suspected Breach

In the event that we become aware of a breach, or a potential breach, an investigation will be carried out. This investigation will be carried out by the point of contact for data protection that will make a decision over whether the breach is required to be notified to the Data Protection Commission. A decision will also be made over whether the breach is such that the individual(s) must also be notified.

E) When A Breach Will Be Notified To The Data Protection Commission

In accordance with the GDPR, we will undertake to notify the Data Protection Commission of a breach which is likely to pose a risk to people's rights and freedoms. A risk to people's freedoms can include physical, material or non-material damage such as discrimination, identity theft or fraud, financial loss and damage to reputation.

Notification to the Data Protection Commission will be done without undue delay and at the latest within 72 hours of discovery. If we are unable to report in full within this timescale, we will make an initial report to the Information Commissioner, and then provide a full report in more than one instalment if so required.

The following information will be provided when a breach is notified:

- a description of the nature of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned; and
 - the categories and approximate number of personal data records concerned
- the name and contact details of the point of contact for data protection where more information can be obtained;

- a description of the likely consequences of the personal data breach; and
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

F) When A Breach Will Be Notified To The individual

In accordance with the GDPR, we will undertake to notify the individual whose data is the subject of a breach if there is a high risk to people's rights and freedoms. A high risk may be, for example, where there is an immediate threat of identity theft, or if special categories of data are disclosed online.

This notification will be made without undue delay and may, dependent on the circumstances, be made before the supervisory authority is notified.

The following information will be provided when a breach is notified to the affected individuals:

- a description of the nature of the breach
- the name and contact details of the point of contact for data protection where more information can be obtained
- a description of the likely consequences of the personal data breach and
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects

G) Record Of Breaches

HCT Learning records all personal data breaches regardless of whether they are notifiable or not as part of its general accountability requirement under GDPR. It records the facts relating to the breach, its effects and the remedial action taken.

Subject Access Request Policy

A) Aim

You have a right, under the General Data Protection Regulation, to access the personal data we hold on you. To do so, you should make a subject access request, and this policy sets out how you should make a request and our actions upon receiving the request.

B) Definitions

“Personal data” is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including your name.

“Special categories of personal data” includes information relating to:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life or
- sexual orientation

C) Making A Request

Although subject access requests may be made verbally, we would advise that a request may be dealt with more efficiently and effectively if it is made in writing. If you wish to make a request, please use the Data Access Request Form which is located on the website or you can call the office.

Requests that are made directly by you should be accompanied by evidence of your identity. If this is not provided, we may contact you to ask that such evidence be forwarded before we comply with the request.

Requests made in relation to your data from a third party should be accompanied by evidence that the third party is able to act on your behalf. If this is not provided, we may contact the third party to ask that such evidence be forwarded before we comply with the request.

D) Timescales

Usually, we will comply with your request without delay and at the latest within one month. Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period is two months. All learner assessment material is destroyed six months after the certification period.

E) Fee

We will normally comply with your request at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may contact you requesting a fee. This fee must be paid in order for us to comply with the request. A fee of €15 will apply to requests for the return of assessment materials.

In addition, we may also charge a reasonable fee if you request further copies of the same information.

F) Information You Will Receive

When you make a subject access request, you will be informed of:

- whether or not your data is processed and the reasons for the processing of your data
- the categories of personal data concerning you
- where your data has been collected from if it was not collected from you
- anyone who your personal data has been disclosed to or will be disclosed to, including anyone outside of the EEA and the safeguards utilised to ensure data security
- how long your data is kept for (or how that period is decided)
- your rights in relation to data rectification, erasure, restriction of and objection to processing
- your right to complain to the Office of the Data Protection Commissioner if you are of the opinion that your rights have been infringed
- the reasoning behind any automated decisions taken about you

G) Circumstances In Which Your Request May Be Refused

We may refuse to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at the latest within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Office of the Data Protection Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. For example, information which is subject to legal privilege or relates to management planning is not required to be disclosed. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided.

1.5.3 Data Retention Policy

All hardcopy information will be stored in a locked, and secure location in HCT Learning's offices, and once information has been updated to MyHCT and/or is no longer required, it will be disposed of through an outsource document destruction service company. These procedures comply with all legislation requirements, ensuring that our client, employee, and learner information is kept confidential and secure at all times. Current policy is that this will be destroyed six months after the certification period.

1.5.4 Assessment Holding Policy

After certification, HCT will store the learners assessments in a secure location on site for a period of 6 months. Learners may wish to request their assessments to be returned to them and HCT are happy to oblige this request. Please note there is an administration and courier cost of €15 applied to this service. All assessments are securely destroyed six months after the certification date. In the case of plagiarism, assessments will not be returned to the learners.

A) Personal Data Stored Online

- Photo identification
 - As part of the certification process, if a learner appears invalid on the QBS (QQI database for certification) system we may have to request a copy of the learners ID (Driving licence, PSC card or Passport). This will be sent onto QQI through QHelp and will be stored online in our shared files until this has been resolved with QQI and will be deleted six months after the certification period.
- Learners assessment
 - Photographic and video evidence is gathered as evidence of skills demonstrations for some programmes.
 - Photographic evidence is uploaded by the trainers onto MyHCT under the relevant programme.
 - Video evidence is submitted to the office on a USB stick or on the company camcorder. This is uploaded to the online shared files. This is then deleted from the camcorder and USB stick. All assessment material online will be deleted six months after the certification period.

B) Personal Data Not Stored Online

In addition to the online storage of HCT Learning's data, HCT Learning also require hardcopy documentation to be gathered. This documentation is generally a part of our programme recruitment, entry and accreditation requirements. Examples of this type of data include:

- All learner assessment related documentation
 - They contain information such as full name, address, PPS, date of birth, gender, contact details, education, and career history.
 - This information is shared with QQI for certification purposes.
 - Videos and photographs may be viewed by a third party such as an External Examiner for certification purposes.
- For trainer and staff recruitment:
 - Copies of certificates
 - CVs
 - Next of kin details
 - Health Questions

1.5.5 Definitions Of Data Protection Act

Data: means automated and manual data

Automated data: means information that:

- a) is being processed by means of equipment operating automatically in response to instructions given for that purpose, or is
- b) recorded with the intention that it should be processed by means of such equipment.

Manual data: means information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system.

What is personal data: "personal data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Sensitive personal data: means personal data as to the following:

- (a) the racial or ethnic origin, the political opinions or the religious or philosophical beliefs of the data subject.
- (b) whether the data subject is a member of a trade union.
- (c) The physical or mental health or condition or sexual life of the data subject.
- (d) The commission or alleged commission of any offence by the data subject.

(e) Any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.

Data Controller: a data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information on computer or in structured manual files.

Data Processor: is a person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of their employment.

Data subject: is an individual who is the subject of personal data.

Processing of or in relation to information or data: means performing any operation or set of operations on the information or data, whether or not by automatic means, including:

- (a) Obtaining, recording or keeping the information or data.
- (b) Collecting, organising, storing, altering or adapting the information or data.
- (c) Retrieving, consulting or using the information or data.
- (d) Disclosing the information or data by transmitting, disseminating or otherwise making it available.
- (e) Aligning, combining, blocking, erasing or destroying the information or data, and cognate words shall be construed accordingly.

Relevant filing system: means any set of information relating to individuals to the extent that, although the information is not processed by means of equipment operating automatically in response to instructions given for that purpose, the set is structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible.

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