

IEC Data Retention Periods

Introduction:

The purpose of this document is to provide a reference to the retention periods of various personal information records held by IEC. This reference document is informed by the statutory obligations of organisations operating in Ireland.

Rationale:

The retention of personal information for operations purposes are clear. However, introduction of the General Data Protection Regulation (GDPR) requires companies to reflect on the duration of data retention, and to consider how long personal data should be kept. Unfortunately, a uniform declaration of a defined length of data retention is impossible, given the variety of statutory obligations in place, which necessitates individual types of personal data information be retained for a defined period of time.

Therefore, a reference of data retention periods was deemed necessary to ensure transparency in the length of data retention for the various forms of personal data that IEC retains.

Scope:

This reference document provides a touch point for employees of IEC to confirm the duration of the data retention period for each of the forms of personal data that it retains. Once the respective duration has elapsed, IEC will ensure that it safely and securely erases the relevant personal data from its records.

This policy should be read in conjunction with the associated Data Protection Policy, Subject Access Request procedure, the Data Retention and Destruction Policy and the Data Retention Periods List.

Data Retention Periods:

When determining the data retention periods, IEC has been guided by employment and other law, as well as the statutory retention periods arising from these and associated laws. Furthermore, limitation periods, needs of the College, and the GDPR principles have been taken into account.

The data retention periods implemented by IEC for HR data are as follows:

Type of Personal Data	Duration
Annual Leave and Public Holiday records	3 years
Carer's Leave records	8 years
Parental Leave records and Force Majeure Leave records	8 years (Parental Leave Acts, section 27)
Hours Worked and related information such as breaks, annual leave and public	3 years (The Organisation of Working Time Act, 1997, Section 25, and the Organisation of Working Time (Records) Prescribed Form and Exemptions, Regulations 2001)
Payslips	3 years (National Minimum Wage Act, Section 22)
Employment Permit records	5 years or for the duration of the employment (whichever is the longer)
Employment records of young persons under 18	3 years

Collective redundancy information	3 years
Taxation Records	6 years (Companies Acts and Taxes Consolidation Act)
Accidents	10 years from date of an accident (the Safety health and Welfare at Work (General Applications Regulation 1993, section 60)
Employee contract	6 years from the date of termination of the employment
CV and interview notes of unsuccessful interviewees	1 year
Signed Documents	Keep any original, signed documents on file as per the timelines outlined above
Other HR details (not included above)	1 year

The data retention periods implemented by IEC for student data are as follows:

Type of Personal Data	Duration
Records relating to summative assessment results	Permanently retained – whether a reward has been recommended or not (level of detail of permanently retained data should be at least sufficient to facilitate the issue of a Europass Diploma Supplement (Assessments and Standards, 2013, section 4.5.2)
Garda Vetting records	Duration of Usage + 1 year (benchmarked to Trinity College Dublin)
External Examiners' reports	Permanently retained (Trinity College Dublin retain for 3 years; UCD & DIT retains indefinitely)
Deferral, withdrawal and applications for transfer	Duration of Studies + 1 year (benchmarked to UCD)
Examination board meeting records	Permanently retained (benchmarked to UCD)

The data retention periods implemented by IEC for other forms of personal data not included above are as follows:

Type of Personal Data	Duration
Security – CCTV footage	6 months , unless specifically required for investigation/security/safety/legal purposes (Trinity College Dublin retain for 1 month)