

LIFFEY COLLEGE



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FETAC SPECIFIC POLICIES

AND PROCEDURES

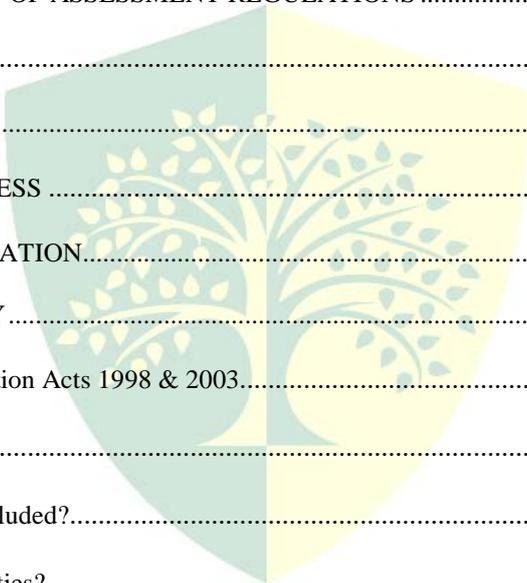
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FETAC SPECIFIC POLICIES AND

PROCEDURES

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POLICY STATEMENT ON ADMISSION TO FETAC COURSES

Admission to a particular course is subject to places being available and is governed by four principles:

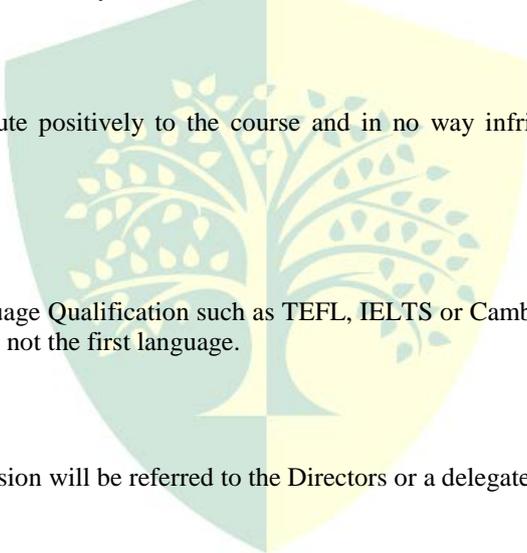
That, in the professional judgement of the College (the term College, indicates the Centre Director or an officer delegated to act on his/her behalf), and following an interview (if deemed appropriate) the learner/participant is suitable for a course.

That, in the professional judgement of the College, the learner/participant, because of previous education, training or experience, is considered likely to benefit from attendance.

That, participation will contribute positively to the course and in no way infringe upon the opportunities or rights of other learners or staff.

Certificates of an English Language Qualification such as TEFL, IELTS or Cambridge course must be produced by students for whom English is not the first language.

All disputes in relation to admission will be referred to the Directors or a delegated officer.



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STUDENT/LEARNER RESPONSIBILITIES

Learners are obliged to make themselves aware of, and comply with, Liffey College rules and regulations. Learners must provide themselves with such books, stationery, equipment and materials as may be required. In addition, and each learner has a responsibility in a number of areas:

(i) Fellow learners

To co-operate in the creation and maintenance of a respectful and suitable environment.

(ii) Staff

To fulfil all obligations to ensure the smooth running of the College.

(iii) College

To respect the buildings and property and to ensure the College maintains a respected position in the community as a whole.

(iv) Community

To behave responsibly and respectfully in the community.

(v) Health and safety

Ensure the Health and Safety procedures and regulations are adhered to.

CHANGE OF REGISTRATION DETAILS

Learners/Students must immediately notify the College of changes in registration details. Liffey College will not be responsible for the consequences due to failure on the part of the learner/student to make such notification.

EXAMINATIONS

Learner/Students must comply with the rules and regulations of the examining body relevant to the course being attended.

ATTENDANCE

Every course/activity requires a commitment to attend, fully and punctually, all parts of the programme on offer. Any learner/student unable to fulfil this commitment may be required to leave the course/activity. Learners/students must comply with the rules and regulations on attendance relevant to that programme. 80 % attendance is required on all programmes.

POLICY STATEMENT ON BULLYING/HARASSMENT

1. Introduction

The College is committed to creating and sustaining a positive and mutually-supportive working environment where staff are equally valued and respected. We acknowledge the following basic rights for all members and prospective members of our community:

- to be treated with respect and dignity
- to be treated fairly
- to receive encouragement to reach their full potential

We are fully committed to maintaining a positive and diverse working environment for individuals in whom people can work productively together, where dignity and respect at work are paramount, equality is promoted, and in which all staff feel valued and respected.

2. Policy statement

It is Liffey College's policy that bullying or harassment of its staff and students is unacceptable behaviour. The College's intention is to promote a working environment and culture free from bullying, discrimination, harassment and victimisation, and it will take necessary steps to protect staff and students from such behaviour under the following acts; Employment Equality Acts 1998 – 2008, Equal Status Act 2000, Disability Discrimination Act 2005, Industrial Relations Act 1990, Health and Safety Act 2005 and the Code of Practice on Sexual Harassment and Harassment.

Please note: this is a Statement of Liffey College Policy on Anti-Bullying/Harassment.

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A full copy of this policy including Liffey College procedure for dealing with allegations of Bullying and Harassment is available from your Centre Director.

POLICY STATEMENT ON EQUAL OPPORTUNITIES FOR STAFF

The purpose of this policy is to build on the statutory position and to create awareness and a climate in which equal opportunity is developed and promoted.

Equal opportunity is an integral part of Liffey College overall policy and must therefore be observed by all staff. Liffey College is relying on the contribution and attitude of all staff in ensuring the overall application of the policy. While Equal Opportunities are formally assigned as an integral part of the responsibility of management, all staff is encouraged to promote equal opportunities for all in working life.

EQUALITY STATEMENT

Liffey College is fully committed to providing a harmonious working and learning environment in which employee and students are able to maximise their full potential and to contribute to the success of the college, irrespective of gender, race, disability, sexual orientation, religious belief, marital status, or membership of the travelling community.

POLICY STATEMENT

- Liffey College is committed to equality of opportunity in all its employment practices, policies and procedures.
- It will ensure that no job applicant or employee will receive less favourable treatment due to gender, marital status, age, sexual orientation, religious belief, disability, race, membership of the travelling community, in terms of recruitment, pay and conditions of work, training and work experience and opportunities for career promotion.
- All employees will be selected, promoted and treated on the basis of their abilities and merits only and according to the job. All employees will have equal opportunities to show ability and to progress within Liffey College.

PROCEDURES REGARDING LEARNER ASSESSMENT, APPEALS AND PLAGIARISM

Assessment

In line with FETAC and Liffey College Quality Assurance procedures all learners will be assessed in a fair and consistent manner using assessment methodologies appropriate to the learner. Learners studying courses accredited by professional bodies may have to comply with additional regulations and should discuss these with their course lecture/tutor.

Students must attempt and pass all assessments, unless otherwise stated. Students must present in person their assessments to the relevant lecture/tutor on or before the submission date. Emailed assessments etc will not be accepted.

Submission policy

Liffey College procedure on Feedback to Learners outlines the college's submission policy as follows:

Information relating to assessment of the programme is provided to all learners. They are made aware of their responsibility in assessment by the tutor. Learners are informed of deadlines for assignments, examination dates etc. Submission of assessment material after advised dates is not permitted except in extenuating circumstances or grounds for compassionate consideration.

Liffey College will judge each application for compassionate consideration or extenuating circumstances on its own merit. Examples of circumstances under which a provider may consider giving compassionate consideration include:

- Physical injury or emotional trauma
- Physical disability or chronic or disabling condition such as epilepsy, glandular fever or other incapacitating illness of the learner
- Recent bereavement of close family member or friend
- Severe accident
- Domestic Crisis
- Terminal illness of a close family member
- Other extenuating circumstances.

Learners seeking compassionate consideration will be required to provide appropriate evidence/documentation e.g. a statement from a medical practitioner.

NOTE: should you think you may not be able to fulfil the requirements of assessments in terms of times, dates required for submission, you **MUST** inform the college. You **MUST** fill in a personal circumstances form, available from your Director of Studies in time for consideration of allowing an extension or a deferral. Informing the lecturer is not sufficient. Should you not have a personal circumstances form for an agreed deferral or extension, the college regulations on late submissions will apply.

Late Submission Policy

Late returns will be penalised as follows:

- **One week late:** 10% deduction from marks.
- After that late assignments will not be accepted for that period.

Exemptions

Liffey College may grant an exemption from a requirement of a programme to a learner on the basis of prior experience at the point of entry to this programme. Exemptions from programmes generally relate to exemptions from particular assessment requirements of a programme. The learner will be required to provide valid and reliable evidence of this prior learning to Liffey College to demonstrate attainment of the exempted element of the programme. The evidence will be assessed and a recommendation will be made. Please note that learners are still required to attend the course on a full-time basis.

Assessment malpractice

Malpractice consists of those acts, which undermine the integrity and validity of assessment, the certification of qualifications, and/or damage the authority of those responsible for conducting the assessment and certification. The procedures for handling malpractice can be found in the College.

Examples of assessment malpractice activities include:

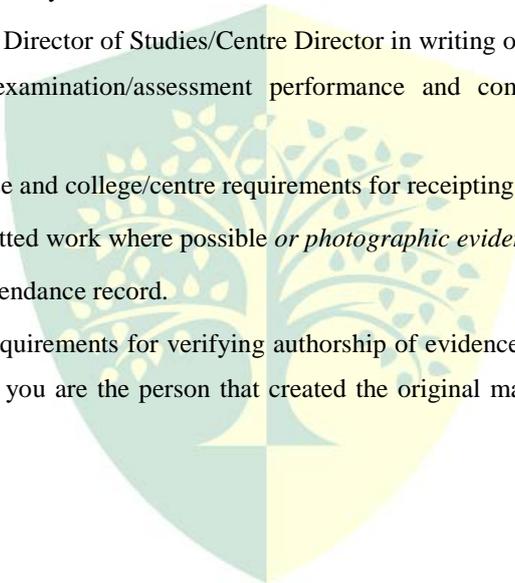
- Learner plagiarism.
- Impersonation of another learner.
- Fabrication of evidence.
- Alteration of results.
- Wrongly obtaining secure assessment materials e.g. examinations.
- Behaving in a way such as to undermine the integrity of the assessment process.

All allegations of malpractice will be investigated and results recorded in the External Authenticator's report.

Learner Responsibilities for Assessment

Learners must:

- Ensure that they are correctly registered on programmes.
- Ensure that they are correctly entered for examinations.
- Attend examinations, class tests, practical's etc.
- Understand the assessment plan and brief and complete all continuous assessment work as required.
- Adhere to deadline dates and timetables.
- Immediately notify the class lecture/tutor in writing of reasons for absence from assessments and supply relevant documentary evidence.
- Immediately notify the Director of Studies/Centre Director in writing of extenuating circumstances that have impeded their examination/assessment performance and complete the Deadline Extension Request Form.
- Comply with any course and college/centre requirements for receipting work.
- Retain a copy of submitted work where possible *or photographic evidence where appropriate*.
- Sign the assessment attendance record.
- Comply with course requirements for verifying authorship of evidence submitted for assessment. This means confirming that you are the person that created the original material for assessment and it has not been plagiarised.



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FETAC ASSESSMENT REGULATIONS

It is your duty to familiarise yourself with the regulations relating to written examinations, assignments and practical assessments and the consequences of infringing these regulations.

Written Coursework (Assignments / Projects)

1. Learners must observe deadlines for submission of written coursework for assessment.
2. Learners must sign a declaration that all coursework (assignments, projects, records, collection of work, portfolios etc) submitted for assessment is your own original work. Materials direct from the Internet or other sources, are not the learners own work, and will be deemed as plagiarism.
3. Where group projects/assignments are undertaken, all candidates must indicate their own work and submit supporting evidence of each individual's contribution to the group project/assignment.
4. Learners must not access files of any other candidate on a computer.
5. Learners must not interfere with or damage in any way the work of other learners.

Written Examinations

1. Learners must carefully note the date, time and location for all written examinations.
2. Learners are required to be in the exam room prior to the commencement of the exam.
3. Learners will not be admitted to the exam room after the exam has commenced.
4. If a learner leaves the exam room before the set end time he/she must give the invigilator the exam papers, answer books and all answer material e.g. disks etc.
5. Learners must not bring any mobile phones, books, paper or notes (except in the case of open book exams) into the exam room.
6. During the exam, learners must not communicate with or attempt to communicate with any other candidate.
7. Learners must not damage the exam room or any of its contents.
8. Learners must obey the directions of the superintendent in all matters relating to the exam.
9. Learners may be expelled from the exam room if their behaviour, in the opinion of the invigilator, could impact on the successful conduct of the exam.
10. At the conclusion of the exam, learners should stop writing immediately, give all answer materials to the invigilator and remain in their seat until instructed otherwise.

Tutors must make this information available to learners

Computerised Examinations

Practical Assessments

The regulations applying to the written examination will be adopted as appropriate for the conduct of practical assessments. In addition students must:

1. Wear personal protective equipment where appropriate to the assessment in question.
2. Use safety procedures and practices at all times.
3. Ensure they do not compromise their own safety, the safety of the assessor, the safety of the public or the safety of the environment.



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Security/Learner Confidentiality

All learner records are stored securely by the College and all information relating to learners is treated in a confidential manner as per the Data Protection Amendment Act 2003.

Integrity of Assessment

Liffey College will ensure the integrity of assessment process with the assessor. The role of the assessor is to evaluate learner evidence and make the assessment decision/judgement on whether the outcome of knowledge, skill or competence, as outlined in the FETAC Module descriptor has been achieved. The assessor will determine that the evidence is valid, reliable and sufficient to make the assessment decision. The assessor is suitably qualified and has the responsibility for the assessment of learners.

They may be the lecturer or tutor. It can also be a workplace supervisor, manager or team leader but will have the subject matter/technical expertise. i.e. they are proficient in the subject/technical area in which they are assessing. In the instance of written exams the assessor will draw from a pool of questions to ensure the validity of assessment. Learners will be advised on the allocation of marks/marking criteria in the learners brief.





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Checklist for a Written Assignment (Guide only)

Here is an example of a checklist that might help you focus on your writing and structure for a written assignment. Before you hand in your essay, use this checklist to ensure that your essay/assignment is complete. If you find problem areas, revise before handing in the assignment. This checklist is used as a reference point for you and is not intended to be the basis for grading.

- Do you have a clear introduction? Does it identify the thematic and organisational structure of the essay? Does it indicate the point of view you will argue?
- Have you organised the material effectively, that is, is the sequence of presentation appropriate?
- Is the presentation reader-friendly, that is, do you indicate clearly the transitions from one section/argument/theme to the next? Do you use headings and sub-headings appropriately? Have you eliminated any repetition of arguments?
- Have you made a persuasive argument to support your informed point of view? Have you addressed both sides of the debate?
- Have you used relevant source material? Have you carefully referenced all your sources, both direct quotations and paraphrasing?
- Do you have a clear conclusion?
- Have you included a bibliography?
- Have you corrected all typing, spelling, punctuation and grammar errors?
- Is your assignment the required length? (Adapted from Briskin, 2005)

(Briskin, L. (2005). "Assigning Grades and Feedback Policies." Retrieved July 14, 2006 from <http://www.arts.yorku.ca/sosc/Foundations.>)

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Repeat Arrangements

As FETAC is based on Continuous Assessment (CA) and must be passed - students may resubmit a CA before the end of the semester with permission from the Director of Studies.

- If the student passes with **50%** from the CAs - then the module is passed.
- If the student fails the module CAs **49%** or below then this module is failed and the student must either retake the module or register to retake the module assessments.
- If the student has an attendance of **80 %** or **more** the student will be allowed to retake the module assessments.
- If attendance is **below 80 %** students will have to register to retake the module and pay the appropriate fees of €20 administration charge.

Details of assessment dates, times and procedures are available on the student notice board.

Learning Resources

Students will have a wide range of learning resources available. However, the principal resource will be the academic literature to be found in textbooks and academic journals. Additional resources will be lecture notes and other notes and hand-outs posted on Moodle, and including in-class discussions, debates, teams and group exercises and presentations. You are advised to check Moodle and the college web site regularly for updates. Changes may be made without notice.

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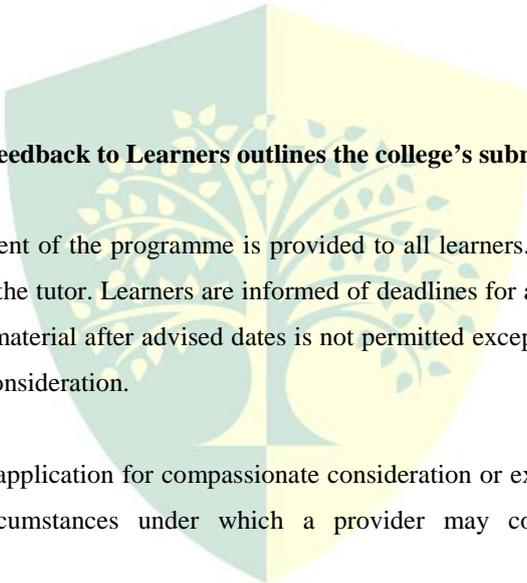
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Assessment Layout Policy

- Keep a soft copy of your project.
- Standard style to be followed – 12pt. Times Roman/Arial; 1.5/2 times line spacing; left justified text.
Printed one-side of the sheet, cover sheet and simple binding.
- Use the Harvard System of referencing in your text.
- Include a competent bibliography in your project
- Late assessments/projects etc will be penalised.

Assignments will be marked as per FETAC as per module descriptor.



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Checklist for a Written Assignment (Guide only)

- Here is an example of a checklist that might help you focus on your writing and structure for a written assignment. Before you hand in your essay, use this checklist to ensure that your essay/assignment is complete. If you find problem areas, revise before handing in the assignment. This checklist is used as a reference point for you and is not intended to be the basis for grading.
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- Have you used relevant source material? Have you carefully referenced all your sources, both direct quotations and paraphrasing?
- Do you have a clear conclusion?
- Have you included a bibliography?
- Have you corrected all typing, spelling, punctuation and grammar errors?
- Is your assignment the required length? (Adapted from Briskin, 2005)

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- If the student has an attendance of 80 % or more the student will be allowed to retake the module assessments.
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WHAT IS PLAGERISM

Plagiarism is a form of academic misconduct, which has a direct impact upon academic integrity. It consists of claiming someone else's work as your own. More explicitly it involves using the words, thoughts and work of others and (either deliberately or accidentally) conveying the idea that the work has all been created by your own effort.

Why is Plagiarism an issue now?

The opportunity to plagiarise is being made easier by the accessibility of electronic information. The Internet provides an infinite number of resources, which can easily be 'copied' and 'pasted' into your own electronic documentation. There are also various 'cheat' sites available where essays can be 'downloaded' for assignments (although the quality of these sites can be extremely dubious).

How do I avoid Plagiarism?

Within the realm of academic work you are expected to make use of a wide variety of sources of information. However you must never pass off other people's material (this includes other students') as your own, as this constitutes plagiarism. One means of avoiding plagiarism is to ensure you correctly reference all your material. Therefore, if a quotation is copied from a text source, or someone else's ideas are used within your work, then the source should always be properly referenced.

There are many resources that can be used to enhance your knowledge and understanding when researching and writing.

However, you must either interpret the resources using your own words or quote them as appropriate, remembering to include the full reference within your document, or at the end. The purpose of any assignment is to improve your own understanding and learning and not your ability to 'copy' and 'paste' other people's work.

What happens if I do Plagiarise work?

Students are asked by the College to sign a declaration on the front cover of any coursework which is submitted, signifying that the work is their own and that they have acknowledged, where appropriate, references to other work in the approved manner. Therefore, there is no excuse for plagiarising. Penalties for such an act can be severe and may result in you failing the whole course.

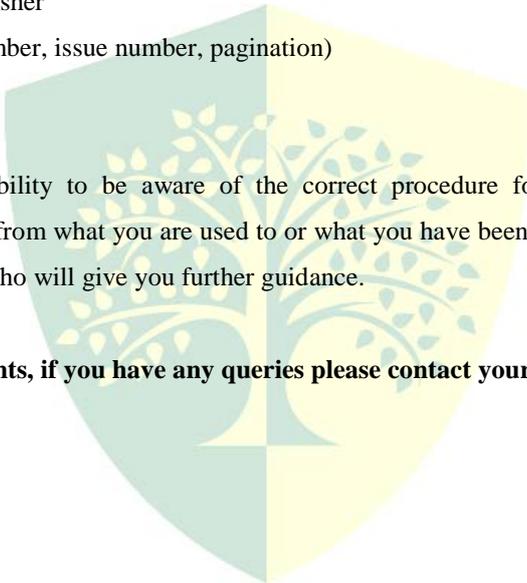
Referencing

Some of the general components a reference should include are:

- a) Author
- b) Year
- c) Title (should be highlighted in different text, e.g. italics)
- d) Material type (e.g. PhD, thesis, [online], software)
- e) Edition (if not first)
- f) Place of publication and publisher
- g) Numeration (e.g. volume number, issue number, pagination)
- h) Date accessed if a web site

Ultimately it is your responsibility to be aware of the correct procedure for quoting and referencing in assignments, as this may differ from what you are used to or what you have been taught. If you are in any doubt then contact your course tutor who will give you further guidance.

Learners/Students, if you have any queries please contact your tutor/lecturer.



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PROCEDURE FOR DEALING WITH PLAGIARISM

- If a Tutor/Lecture suspects that plagiarism has occurred, they should inform the learner of their concern.
- The Centre Director should also be informed. The work should be returned to the learner
- The learner, if they so wish, can have their work reviewed by another member of the academic team.
- If plagiarism is confirmed, it will be recorded on the student's file.
- The student will be asked to re-submit their work.



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PENALTIES FOR BREACHES OF ASSESSMENT REGULATIONS

Any breach of Liffey College Assessment Regulations or attempted breach, by any learner or on behalf of any other learner will be treated as an offence. A breach of assessment regulations shall be deemed to have occurred when there has been an actual or attempted form of:

- Cheating
- Copying
- Plagiarism
- Misrepresentation
- Bribery
- Falsification
- Personating or other such form of deception
- Untrue claims of ownership of assignments carried out by the learner

Penalties

Penalties imposed for breach of assessment regulations may constitute any or all of the following:

- No credit in the assessment or part of the assessment in which the offence was committed.
- No credit for the module in which the offence was committed.
- No credit for all of the modules for a particular year of the course being followed.
- Ineligible for an award during the year of the breach.
- Suspension of the candidate, from all activities of the College, for a fixed period of time.
- A recommendation to the Centre Director for the formal expulsion of the candidate from the College.

Learners will be notified in writing when a suspected breach of assessment regulations is being investigated.

Appeals Process

Learners wishing to appeal results should contact the Centre Director directly within 14 days of receiving results. There is a nominal fee of €20 and the appeal will be addressed by the results approval panel who will recommend appropriate action.

Following assessment grades and feedback being issued to students tutors will be available to discuss these with students who wish to query their assessment outcome or who require assistance with understanding their assessment outcome. Where a student is dissatisfied with the application of the assessment process in relation to their work the following appeals procedure applies. Students may appeal to the College for their work to be re-checked and/or reviewed.

Please note that any request for an appeal must be made in writing to your tutor and signed by you in order for it to be given consideration.

RE-CHECK means the administrative operation of checking the recording and the addition of marks

REVIEW means the re-consideration in detail of all or part of the existing assignment and examination material where feasible by an internal tutor and/or the External Authenticator.

The following steps apply to either of the above procedures.

1. The grounds for re-checking and reviewing must be specified under the following three headings:

The assessment/examination procedures of the College have not been properly implemented.

The procedures do not adequately cover the student's individual requirements

Compassionate circumstances were not adequately taken into account in the assessment process.

2. The written submission for an appeal must identify the elements of the assignment or examination for which the re-check or review is being sought. It must also specify the grounds on which the re-check/review is sought and must contain all the information that the student requires to have taken into account in the recheck or review.

3. The appeals process is as follows:

i. Having specified the details required in sections one and two above, the student may appeal in writing to his/her tutor within two weeks of receiving the grade/feedback and additional feedback will be given.

ii. If, following discussion with his/her tutor, the issue has not been resolved to the students satisfaction, he/she may request in writing to the Director of Studies/ Centre Director that their work be further cross marked by the Director of Studies/ Centre Director and feedback will be given.

iii. If, following steps one and two, the student wishes to make a further appeal, he/she may request in writing to the College Director (within a period of three weeks) that his/her work be reviewed through the External Authentication and Results Approval processes.

iv. The decision of the Results Approval Panel is final and the result will be forwarded to FETAC. Students are advised that, as a result of any appeal their grades may go up or down.

FETAC APPEALS PROCESS

Module results can also be appealed to FETAC. This option is available only after the internal appeals process has been completed and where the student is dissatisfied with the outcome of the internal appeals process. In this instance FETAC will check that the providers assessment policy and procedures have been implemented appropriately in relation to the work being appealed, i.e. Learners appeal the outcome of the provider's assessment and appeals process *only*; not the assessment result.

Appeals to FETAC should be directed through the Liffey College.



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REASONABLE ACCOMMODATION

In keeping with the student centred ethos of the Liffey College, the College will endeavour to support and facilitate any student with a disability or specific learning difficulty, in an individualised and effective manner. In order to provide effective and appropriate supports, it is necessary that students disclose the nature of their disability/difficulty and discuss appropriate supports with a member of the College team as soon as possible. Such disclosures and discussions will be dealt with in a sensitive manner, unique to each circumstance.

Reasonable accommodation is the term used for adaptation of assessment as needed. It caters for the needs of learners whose personal situation means that the assessment would otherwise be unfair. These learners include those covered by equality legislation and those with a disability.

Students may be required to produce written confirmation from a medical practitioner of any medical condition or disability requiring additional supports, and in the case of a specific learning difficulty a psychologist's report not more than two years old will be required.

Learners requiring special adaptations/arrangements are identified during registration and induction. Assessment adaptations are agreed and implemented to meet learner needs. It facilitates their demonstration of achieving the standards being assessed. Adaptations include:

Modified presentation of assignment/ examination.

- Enlargements
- Scribes/ readers
- Use of sign language
- Practical assistants
- Rest periods
- Adaptive equipment/software
- Extra time (maximum of 30 minutes)
- Spelling and grammar waiver for assessments

**Please note that these accommodations are provided to individual students to support and facilitate their successful participation on their course. The College remains cognisant of providing a fair and equitable service to all students; therefore these accommodations will not be available to any student without professional, written confirmation of disability/ learning difficulty.*

DATA PROTECTION POLICY

Guidelines on Data Protection Acts 1998 & 2003

The objectives of this document are:

- to give an overview of the Data Protection legislation that applies in the Republic of Ireland
- to summarise the responsibilities of staff and students within Liffey College and
- to summarise the rights of individuals under the legislation.

Further information is available at: <http://www.dataprotection.ie>

What is Data Protection?

Data protection addresses the safeguarding of the privacy rights of individuals in relation to the processing of personal data. The Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons processing personal data.

Liffey College, in common with many other organisations such as government bodies, finance houses and other universities etc gathers and stores data about individuals. This is necessary for the purposes of running the operations of the College. For the purpose of data protection, such organisations or individuals who control the contents and use of personal data are known as DATA CONTROLLERS. The Data Protection Acts 1988 and 2003 impose obligations on data controllers and give rights to individuals relating to their personal data.

What types of Data are included?

All personal information relating to a living individual is included under the legislation. It covers data that is held on computers as well as data that is held in manual files.

It applies to all the data that is held - for example it applies to data in emails and copy letters as well as to data on Master Files etc.

What are your responsibilities?

Any member of the Liffey College community that is involved in the collection, storage or processing of such data has responsibilities under the legislation.

Examples would include people involved in the collection of data from people applying to do courses at Liffey College, those involved in the recruitment of staff, those involved in the processing of accreditation data etc.

Our Responsibilities:

- to obtain and process information fairly
- to keep it only for explicit and lawful purposes
- not to disclose it to others
- to keep it safe and secure
- to keep it accurate, complete and up-to-date
- to ensure that it is adequate, relevant and not excessive
- to retain it for no longer than is necessary for the explicit purpose
- to give a copy of the data to an individual, on request (such a request is known as an ACCESS REQUEST).

What are rights as an individual?

- to have your personal information obtained and processed fairly, kept securely and not illegitimately disclosed to others
- to be informed, to know the identity of the Data Controller and for what purpose they have the information
- to get a copy of the personal information
- to have your personal data corrected or deleted if inaccurate
- to prevent your personal information from being used for certain purposes, for example you might want your data blocked for research purposes where it is held for other purposes
- to have your name removed from a direct marketing list
- to stop some specific uses of your personal information
- to Employment Rights, not to be forced to disclose information to a prospective employer. No one can force you to make an access request, or reveal the results of an access request, as a condition of recruitment, employment or provision of a service. Where vetting for employment purposes is necessary, this can be facilitated where the individual gives consent to the data controller to release personal data to a third party
- to freedom from automated decision making, to have human input in the making of important decisions relating to you. Important decisions about you, for example, work performance, creditworthiness, reliability may not be made solely by automatic means e.g. by computer, unless you consent to this. In general there has to be a human input in such decisions
- to prevent your phone directory details from being used for direct marketing purposes.

For further information:

- Within Liffey College, the Centre Director has responsibility for the co-ordination of Data Protection issues.



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