

CENTRAL
APPLICATIONS
OFFICE

DATA RETENTION POLICY

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1. Introduction

The Central Applications Office (Universities and other Higher Education Institutions) (“CAO”) is controlled by the Higher Education Institutions (“HEIs”). The mission of the CAO is to be the leading provider of centralised application processing services for Irish post-secondary education providers.

The purpose of this policy is to outline how documents, including documents with personal data, are retained and protected within the CAO and when applicable destroyed by the CAO. This policy also outlines the rationale behind the periods of time chosen in the document retention schedule. The term “document” is used in this policy to include, *inter alia*, hardcopies of documents (e.g. paper), softcopies of documents (e.g. scanned images of paper documents), data received by entry on the CAO website (e.g. CAO application) and data received by transfer from third party (e.g. examination results). This policy is made publicly available as part of ensuring compliance with data protection legislation, *inter alia*, Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation) ('GDPR').

2. Document Protection

The CAO is committed to preventing unauthorised access to documents which it has in its control. Hardcopies of documents related to personal data are kept securely onsite until destruction. If off-site document scanning of hardcopies is required, they are transferred securely to the off-site location, where they are stored securely and returned promptly. The CAO use state of the art technology and techniques to ensure the security of data held on its system and this process is audited on a regular basis. Data held off-site for back up or cloud computing purposes is only held by companies of equivalent high security standards which is also independently audited.

3. Document Destruction

Hardcopy of documents will be destroyed by shredding after they have been retained until the end of the document retention schedule. Electronically stored data will be erased after they have been retained until the end of the document retention schedule. The media used to store this data such as hard disk will be physically destroyed at the time of their decommissioning.

4. Rationale for Retention Time Periods

The CAO retains a range of documents which are outlined in the document retention schedule below. Corporate Records, Financial Records, Tax Records and Insurance Records are kept for periods of time which is deemed best practice for compliance with company law and demonstration of tax compliance. Personnel Records related to an employee are kept for the entire period of employment, and then destroyed after 7 years (one year greater than the period of limitation in the Statute of Limitations, 1957). The period of time for which a contract is retained depends on the type of contract and ranges from 7 years to permanent. HEI records are kept on a register of operating contracts, user spreadsheets and copies of contracts.

The CAO holds a range of personal data relating to the CAO applicant. Data provided by the applicant directly is deleted after 7 years which is one year greater than the longest undergraduate course allowing the CAO to provide this data in case of a dispute with HEI/Data subject and is also one year greater than the period of limitation in the Statute of Limitations, 1957. In order to reduce excessive retention and due to limitations of space, both computing and physical, physical documents are kept for a period of between 1 and 2 years depending on storage limitations and scanned documents are kept for a period of 2 years. Due to the applicant requirement to provide a CAO number to third parties, the CAO permanently retains a record of application (CAO Number, Name, Address, Date of Birth, Sex and Phone Number) in order to provide, in the public interest, applicants to third parties their CAO number.

The CAO permanently retains Leaving Certificate examination records received from the State Examinations Commission, to identify results from previous years Leaving Certificate Examinations for current year applicants. The CAO may also use this data to validate and confirm results provided by an applicant. It is also used to compile relative performance ranking scores for applicants to certain courses. Other qualification and exam data received electronically is deleted after seven years this period is based on the same rationale as personal data in general. Hard copies of examination records which are scanned are deleted after two years in order to reduce excessive retention and due to limitations of space, both computing and physical, within CAO.

5. Document Retention Schedule

The following types of documents will be retained for the following periods of time. At least one copy of each document will be retained according to the following schedule.

Corporate Records

Articles of Association	Permanent
Memorandum of Understanding	Permanent
Board policies	Permanent
Resolutions	Permanent
Board meeting minutes	Permanent
Tax exemption documents	Permanent
Tax or employee identification number designation	Permanent
Annual corporate filings	Permanent

Financial Records

Chart of Accounts	Permanent
Fiscal Policies and Procedures	Permanent
Audits	Permanent
Financial statements	Permanent
General Ledger	Permanent
Check registers/books	7 years
Business expenses documents	7 years
Bank deposit slips	7 years
Cancelled cheques	7 years
Investment records (deposits, earnings, withdrawals)	7 years
Invoices	7 years
Property/asset/equipment inventories	7 years
Expense Claims	7 years
Petty cash receipts/documents	3 years
Chargeback documentation	1 year
Credit card receipts	3 years

Tax Records

Annual tax filing for the organization	Permanent
Payroll registers	Permanent
Filings of fees paid to professionals	7 years
Payroll tax withholdings	7 years
Earnings records	7 years
Payroll tax returns	7 years

Personnel Records

Employee offer letters	Permanent
Confirmation of employment letters	Permanent
Benefits descriptions per employee	Permanent
Pension records	Permanent
Employee resumes and contracts	Permanent
Promotions, demotions, letter of reprimand, termination	Permanent
Annual Leave Records	7 Years
Workers' Compensation records	7 years
Salary ranges per job description	7 years

Insurance Records

Property Insurance policy	Permanent
Directors and Officers Insurance policy	Permanent
Workers' Compensation Insurance policy	Permanent
General Liability Insurance policy	Permanent
Insurance claims applications	Permanent
Insurance disbursements / denials	Permanent

Contracts

All insurance contracts	Permanent
Employee contracts	Permanent
Construction contracts	Permanent
Legal correspondence	Permanent
Loan / mortgage contracts	Permanent
Leases / deeds	Permanent
Vendor contracts	7 years
Warranties	7 years

Management Plans and Procedures

Strategic Plans	7 years
Operational Procedures	Permanent
Vendor contacts	7 years
Disaster Recovery Plan	Permanent

Application Records

Record of Application	Permanent
Personal data (including log files)	7 years – earlier data anonymised
Offer/Acceptance records	7 years – earlier data anonymised
Statistical information	Permanent
School data	7 years

Examination Records

Leaving Certificate data	Permanent
GCE data received from Council for the Curriculum, Examinations and Assessment (CCEA)	7 Years
Other GCE data	7 Years
QQI data	7 Years
Other qualifications data	7 Years
HPAT	7 Years
GAMSAT	7 Years
MSAP	7 Years

Scanned Documents

Qualifications	2 years
Supplementary Information Forms (including DARE)	2 years
Higher Education Access Route forms	2 years

HEI Records

Contact details	Permanent
Computer account records	Permanent

Technical and Other Records

Access Log Files	7 Years
Phone Records Logs	7 Years

General Queries from Public via website	7 Years
Event Registration (e.g. Guidance Counsellor conferences)	7 Years
Contact lists for Professional Engagements (e.g. list for documents circulation)	Permanent