

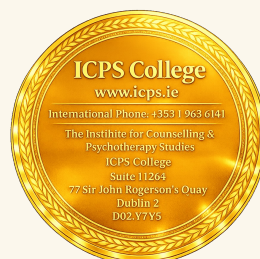


Record Keeping & Data Protection Policy

The institutional framework governing the maintenance, access and quality assurance of learner assessment records under GDPR and Irish data protection legislation

The Institute for Counselling & Psychotherapy Studies *ICPS College, Dublin*

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Why We Keep Records

ICPS College maintains a comprehensive record-keeping system to support learner achievement, quality assurance, accreditation, and the legitimate interests of all members of the College community.

Records are kept for the following principal purposes:

- ◆ Records are kept in order to provide accurate information on learner achievement and to confirm that achievements are mapped to the stated assessment criteria.
- ◆ They contribute to quality assurance and standardisation processes.
- ◆ They provide a basis for feedback to learners and help in the review of their progress.
- ◆ They provide vital evidence in the event of learner appeals.
- ◆ They are used to inform internal targets and to meet external awarding organisation audit requirements.

Access to Learner Assessment Records

Access to learner assessment records is governed strictly by role-based permissions, with each role limited to the records necessary to perform that role's legitimate functions.

- ◆ **Learners** have access to sections which aid them in their progression.
- ◆ **Staff involved in delivery and tracking** — assessors and tutors — have access for the purpose of assessment, feedback and progression management.
- ◆ **Administrators** have access for the purpose of registration, certification and the maintenance of institutional records.
- ◆ **Internal Verifiers / Internal Quality Assurers (IV/IQA)** have access for the purpose of internal verification and quality assurance of assessment decisions.
- ◆ **External Verifiers / External Quality Assurers (EV/EQA)** have access for the purpose of external verification on behalf of the awarding body or accrediting authority.

Regulatory Framework

The maintenance of records at ICPS College is governed by the following regulatory framework:

- ◆ **The General Data Protection Regulation (GDPR) — (EU) 2016/679**, as it applies to the processing of personal data within the European Economic Area
- ◆ **The Data Protection Act 2018 (Ireland)** — the principal Irish national legislation giving effect to the GDPR
- ◆ **The standards of the CPD Standards Office** — under which the College holds Provider Number PDCD1110, including standards relating to assessment records and audit
- ◆ **The professional standards of relevant alignment bodies** — including the Irish Counselling and Psychotherapy Association (ICPA), in respect of records relating to professional practice

Special Category Data

Where records include special category data under Article 9 GDPR — for example, mental-health-related material in clinical training records — additional safeguards apply, including explicit consent requirements, enhanced access controls, and the data minimisation principle. The College's Privacy Policy provides further detail on the processing of special category data.

Responsibilities for Records

Responsibility for the completion and storage of assessment records is allocated as follows. Each role-holder is accountable for the integrity, accuracy and proper handling of the records within their remit.

Role A — Assessors

Assessment Tracking & Feedback. Assessors are responsible for completing the assessment tracking documentation and ensuring feedback is provided to guide learner progression. It is the assessor's responsibility to work with the nominated administrator, if necessary, to upload learner achievement onto the College's learning management platform (Moodle).

Role B — Internal Verifiers / Internal Quality Assurers

Information Management & Pre-External Confirmation. Internal Verifiers and Internal Quality Assurers are responsible for managing the assessment information and for ensuring that all assessment requirements are undertaken. They confirm that achievements have been verified prior to External Verification or External Quality Assurance taking place, where required.

Role C — Administrators

Institutional Recordkeeping. Administrators are responsible for the institutional storage of records, the operation of the learning management platform, the secure handling of personal data, and the production of certificates and transcripts in accordance with verified assessment outcomes.

Role D — External Verifiers / External Quality Assurers

Independent Verification & Reporting. External Verifiers and External Quality Assurers (EV / EQA) are responsible for verifying the achievement and for completing the required reports on behalf of the awarding body or accrediting authority. The College facilitates this process by making records available promptly upon request.

***Retention & Cross-Reference.** This policy operates in conjunction with the College's **Retention of Learner Evidence** policy, which sets the minimum seven-year retention period for assessment records, and with the **Privacy Policy**, which governs the lawful processing and storage of personal data.*

APPROVED BY

Head of Academic Standards & Accreditations

ICPS College · Dublin, Ireland

DOCUMENT ENDS