

## QIP Implementation Summary Report

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| Department/Service:                                           |                                                                                                                                                                                         | Information Compliance Office |      |            |
| Head of Department/Service:                                   |                                                                                                                                                                                         | Elaine Mulqueen               |      |            |
| Date of ET approval of QIP                                    |                                                                                                                                                                                         | 10 November 2022              |      |            |
| Date of Submission of QIP Interim Report to Quality Committee |                                                                                                                                                                                         | 20 October 2023               |      |            |
| Date of Submission of QIP Final Report to Quality Committee   |                                                                                                                                                                                         | 27 January 2025               |      |            |
| Summary of status of recommendation implementation:           |                                                                                                                                                                                         |                               |      |            |
| Recommendation / Action Item No.                              | Recommendation                                                                                                                                                                          | Closed                        | Open | Commentary |
| 2.2.1                                                         | The PRG endorses the recommendation at point 2.4.5 of the SAR, that the DPO function should be repositioned at a level between ICM and the VPGS.                                        | X                             |      |            |
| 2.2.2                                                         | The PRG endorses that element of the recommendation in the SAR at 2.4.5 that calls for a realistic assessment of the necessary resources to maintain day-to-day operations within ICRM. | X                             |      |            |
| 2.2.3                                                         | Furthermore, the PRG takes the view, based on its own user-experience, that the deployment of Privacy-                                                                                  | X                             |      |            |

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|         | Engine with its full functionality may have potential to save considerably on the human resource input necessary to enable effective ongoing monitoring and control of compliance. This deployment, in itself, however, will require some resourcing for an implementation period. This should urgently be considered.                                                                                                                                                                                                            |   |  |                                                                                                                   |
| 2.2.4   | There is scope for an operational as well as a messenger/advocate role for the Data Champions Network. One example of this might be for the Data Champions to become active Privacy-Engine users, updating the Registers of Processing Activity for their own individual areas. The recommendation is that a working review be conducted with a view to reframing and stating the role of the Data Champion in measurable, operational and deliverable terms in addition to its important advocacy work, (which should continue). | X |  |                                                                                                                   |
| 3.1.2.1 | Explore the use of Privacy Engine for dissemination of policies to staff and for highlighting when policies are due for review.                                                                                                                                                                                                                                                                                                                                                                                                   | X |  | Implemented the use of Privacy Engine for dissemination of policies to staff and created an SOP ICP-034 for this. |

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| 3.1.2.2 | The PRG recommends that ICRM consider initiating the development of a Peer Network at a local/regional level among public bodies with similar challenges.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | X |  |                        |
| 3.2.2.1 | Please see recommendations at 3.5 that have implications for Quality Assurance & Enhancement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | X |  | Implemented under 3.5. |
| 3.3.2.1 | <p>Please see recommendations at 3.5 that have implications for Quality Assurance &amp; Enhancement.</p> <p>The Recommendation within the SAR, at 3.3.7 states <i>“As a function of due diligence and as expressed by a relevant protocol and internal control, the ICRM Office should be involved in projects that involve the generation of records from the outset...”</i></p> <p>This is a worthy recommendation and the PRG’s recommendation at 3.5 may help to operationalise the line-of-sight required to know what record-generating projects are taking place around MIC.</p> <p>The ‘protocol’ and ‘internal control’ might be identified from the substantive</p> | X |  | Implemented under 3.5. |

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|           | recommendation at 3.5.                                                                                                                                                                                                                                                                                                         |   |   |                                                                                                                                                                                                                                                                                         |
| 3.3.2.2.1 | Set the frequency of the review the Records Retention Schedule and enhance version control of it;                                                                                                                                                                                                                              | X |   | Records management conducted outside the Privacy Engine system. Superseded by Register of Processing Activities (RoPA)Project 2024.                                                                                                                                                     |
| 3.3.2.2.2 | Review the Records Retention Schedule, adding more granularity regarding what gets retained and for how long. Consult with record owners regarding retention periods, placing the onus on them to decide on the retention period for their records, Provide advice on legislative requirements for retention where applicable; |   | X | Superseded by RoPA Project 2024.<br>Record owners consulted on retention periods as part of the 2024 RoPA review (Directors and HODs were the contact points). ICRM is in consultation with all MIC offices regarding the individual office RRSs. This project will continue into 2025. |
| 3.3.2.2.3 | Conduct a review of adherence to the records retention schedule for both paper and electronic records;                                                                                                                                                                                                                         |   | X | Review of adherence to RRS did not commence as it is beyond the capacity of the ICRM team.                                                                                                                                                                                              |
| 3.3.2.2.4 | Liaise with HR to organise staff training on digital records;                                                                                                                                                                                                                                                                  |   | X | In progress - ICT to assess level of Digital Records training required.                                                                                                                                                                                                                 |
| 3.3.2.2.5 | Initiate discussion between the ICRM Office and ICT Services aimed at an integrated system of records storage, with formal roles and control responsibilities, as well as establishing cumulative reporting frameworks;                                                                                                        | X |   |                                                                                                                                                                                                                                                                                         |
| 3.3.2.2.6 | Undertake, in conjunction with the Procurement Office, a review service procurement                                                                                                                                                                                                                                            | X |   |                                                                                                                                                                                                                                                                                         |

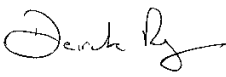
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|           | practice, leading to new procurement protocols and commercial service agreements, as necessary;                                                                                                                                                                                                                        |   |   |                                                                                                                                          |
| 3.3.2.2.7 | Expedite the planned exploration of options for maintaining a College archive and ensuring that access to this is fully compliant;                                                                                                                                                                                     |   | X | Terms of Reference for a College Archive have been drafted and are under review by the Vice-President of Governance & Strategy.          |
| 3.3.2.2.8 | Place a renewed focus on establishing the appropriate division of responsibility for treatment and retention of research data containing personal information as produced by the MIC academic community, as well as support for the research ethics approval process where compliant data management is a requirement; | X |   |                                                                                                                                          |
| 3.3.2.2.9 | Undertake a review of the storage infrastructure on the Thurles campus.                                                                                                                                                                                                                                                |   | X | Review of storage infrastructure on Thurles campus will continue into 2025.                                                              |
| 3.4.2.1   | The PRG recommends in the context of fully-operationalising Privacy-Engine, that the following processes be adopted:                                                                                                                                                                                                   | X |   |                                                                                                                                          |
| 3.4.2.1.1 | SAR and FOI should be recorded in Privacy Engine.                                                                                                                                                                                                                                                                      | X |   |                                                                                                                                          |
| 3.4.2.1.2 | Integration of risks identified by PrivacyEngine into the ICRM Risk Register.                                                                                                                                                                                                                                          | X |   | The Record of Processing Activities (RoPA) has reverted to excel format for ease of ICRM accessibility and maintenance. Risks identified |

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|           |                                                                                                                                                                                                                                                                                                                                                                                         |   |  | by ICRM and reported to offices as appropriate. |
| 3.4.2.1.3 | Assignment of risks on Privacy Engine to appropriate owners within MIC who will then be responsible for the mitigation actions.                                                                                                                                                                                                                                                         | X |  |                                                 |
| 3.5.2.1   | The PRG recommends that a process of rolling-review, incorporating a review of ROPA, current physical and electronic storage practices, external relations and DSAs, new processes and technologies and compliance with retention schedule should be put in place and it should engage each office, faculty, service of MIC and be incorporated within the Annual Service Plan of ICRM. | X |  |                                                 |
| 3.6.2.1   | The PRG recommends that ICRM liaise with key stakeholders, (e.g. ICT), to examine the potential for Privacy-Engine to provide a single, traceable platform for training delivery and participation, (mandatory and optional), across the elements of the organisation that target training at various staff and/or student cohorts.                                                     | X |  |                                                 |
| 3.6.2.2   | The PRG recommends that the highest levels of governance and leadership at MIC should communicate                                                                                                                                                                                                                                                                                       | X |  |                                                 |

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|           | to all management and staff that mandatory training is designed to protect the rights of staff and students and must be undertaken fully and without exception.                                                                                                                                       |   |  |  |
| 3.6.2.3   | The PRG endorses the planned improvements and recommends they should proceed (SAR Section 3.6.6).                                                                                                                                                                                                     | X |  |  |
| 3.6.2.3.1 | Request assistance from HR for the delivery of in person training, in particular organising training sessions and recording participation.                                                                                                                                                            | X |  |  |
| 3.6.2.3.2 | Request participant evaluation for in person training.                                                                                                                                                                                                                                                | X |  |  |
| 3.6.2.3.3 | Develop more structured training programmes to be delivered over the next 4-years. As a first step document the procedure for GDPR training to include induction training for all staff with a more tailored approach to further training which will be dependent on the role and seniority of staff. | X |  |  |
| 3.6.2.3.4 | Generate reports from PrivacyEngine to enable informed decision making and service planning.                                                                                                                                                                                                          | X |  |  |
| 3.6.2.3.5 | Continue to develop the Data Protection Champions network, liaise with remaining XProfessional Services and Academic Heads of Department to                                                                                                                                                           | X |  |  |

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|           | establish more Data Protection Champions.                                                                                                                                                                                                                                                                                                                                                                                                                                      |   |  |  |
| 3.6.2.3.6 | Try different training methods such as scenarios and role play in in person training.                                                                                                                                                                                                                                                                                                                                                                                          | X |  |  |
| 3.6.2.3.7 | Offer to attend academic department meetings once a year to raise awareness among academic staff.                                                                                                                                                                                                                                                                                                                                                                              | X |  |  |
| 3.6.2.3.8 | Continue to provide training and support to Data Protection Champions using PrivacyEngine.                                                                                                                                                                                                                                                                                                                                                                                     | X |  |  |
| 3.6.2.3.9 | Increase awareness among students regarding how the institution protects their data and how their personal data is stored and used.                                                                                                                                                                                                                                                                                                                                            | X |  |  |
| 5.2.1.1   | The PRG recommends that actions to raise the profile and visibility of ICRM should include the positioning of either ICM or a newly repositioned DPO at a number of points in committees and boards structures of the College:<br>ICT Committee<br>Standing Report to ARC<br>Attendance at Research Ethics Committee<br>Mandated (by Academic Council in the context of appropriate internal control) periodic attendance at:<br>Faculty Management Committee<br>Faculty Board | X |  |  |

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| 5.2.1.2 | It is recommended too, that Academic Council make a determination as to what other academic fora Data Compliance ought to appear at in order to assure internal control. This must include the governance structures of the Research and Graduate School. | X |  |  |
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Signed: 

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Director of Quality

Date: 16/07/2026