

## Contents

<b>SECTION 1: PRIVACY NOTICE.....</b>	<b>2</b>
<b>SECTION 2: WHO WE ARE .....</b>	<b>2</b>
<b>SECTION 3: COLLECTION OF PERSONAL INFORMATION: REGISTRANTS, APPLICANTS, SERVICE USERS, BOARD OF DIRECTORS AND REGISTRATION PANEL MEMBERS .....</b>	<b>3</b>
<b>SECTION 4: USE OF INFORMATION .....</b>	<b>6</b>
<b>SECTION 5: RETENTION OF INFORMATION .....</b>	<b>8</b>
<b>SECTION 6: WHO HAS ACCESS TO YOUR INFORMATION? .....</b>	<b>9</b>
<b>SECTION 7: WILL MY INFORMATION BE KEPT CONFIDENTIAL? .....</b>	<b>10</b>
<b>SECTION 8: WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA? .....</b>	<b>10</b>
<b>SECTION 9: WHAT IS THE DATA PROTECTION CONSENT FORM?.....</b>	<b>11</b>
<b>SECTION 10: WHAT WILL HAPPEN IF WE CHANGE OUR DATA PROTECTION NOTICE? .....</b>	<b>11</b>
<b>SECTION 11: LINKS TO OTHER WEBSITES .....</b>	<b>11</b>

## Section 1: Privacy Notice

1.1 The Regulatory Centre for Irish Sign Language Interpreters Ireland CLG has been established for the purpose of maintaining the register of Irish Sign Language Interpreters and quality assurance scheme ("the Register"), This company will operate under the business name of RISLI.

We are committed to protecting and respecting the privacy of registrants, applicants, and service users.

1.2 This Policy explains:

- a) the identity of the data controller
- b) when and why personal information is collected about registrants, applicants, and service users
- c) how we use it
- d) the conditions under which we may disclose it to others
- e) how we keep it secure

1.3 Any questions regarding this Policy and our privacy practices should be sent either:

- a) by email to [admin@risli.ie](mailto:admin@risli.ie)
- b) by writing or in person to Register of Irish Sign Language Interpreters, Deaf Village Ireland, Ratoath Road, Cabra, Dublin 7
- c) by Irish Sign Language (ISL) Video, text, phone call to Mobile 086 138 0180

1.4 It is intended that the Register will be accessible for all, including ISL users. Information can be requested and delivered in ISL should a registrant, applicant, or member of the public wish. Requests for information in ISL can be made:

- a) via webcam based apps and programs, such as Zoom, Whats App etc.
- b) in person at our offices by appointment.

## Section 2: Who We Are

2.1 RISLI is a data controllers in respect of data processed. RISLI:

- a) maintains the Irish national Register of Irish Sign Language / English interpreters
- b) sets minimum standards for registration
- c) sets minimum ongoing professional development requirements
- d) ensures registrants comply with RISLI's policies
- e) promotes awareness of the Register and the purpose of registration

2.2 Registration of interpreters provides reassurance to purchasers and users of the service, of the level of professionalism expected from the interpreter.

2.3 The Register is governed by the Board of Directors, and Registration Panel is a not for profit organisation and a registered charity (Charity No: CHY 17461). The registered address of RISLI is, Deaf Village Ireland, Ratoath Road, Cabra, Dublin 7

## Section 3: Collection of Personal Information: Registrants, Applicants, Service Users, Board of Directors and Registration Panel members

- 3.1 We obtain information about registrants and applicants when completed application forms to join the Register are received and the application progressed. We obtain information about registrants and applicants to ensure they meet the criteria for maintaining registration (For example, evidence of Work Practiced and evidence of completed Continuous Professional Development).
- 3.2 In relation to the **lawful grounds for collection** of registrants' and applicants' personal information, the lawful basis for the collection of registrants'/applicants' personal information is that the registrant/applicant has given their consent and/or the processing is in the legitimate interests of the company/organisation.<sup>1</sup> In so far as legitimate interests is concerned, that the processing is necessary to protect users of interpreting services (primarily the Deaf community and service providers) through a standards-based registration system for sign language interpreters, under the Legitimate Interests of the Data Controllers and that this does not override registrants' interests or fundamental rights. We have also concluded that it is in the legitimate interest of registrants to provide this data, as without it, the services offered would not be available to them. We believe that a registrant/applicant would reasonably expect that this data would be required.
- 3.3 The **personal information we collect** from registrants/applicants might include (but is not limited to):
- a) Registrant's or applicant's name
  - b) Registrant's or applicant's address
  - c) Registrant's or applicant's contact number(s)
  - d) Registrant's or applicant's email address
  - e) Registrant's or applicant's date of birth
  - f) Any other documents deemed necessary and proportionate
- 3.4 Specifically in the case of **applications for registration**, other personal information we collect might include (but is not limited to):
- a) Application forms for the Register
  - b) Copies of qualification certificates for verification and authentication
  - c) Reference letters
  - d) Photographs (for ID cards and online Website Directory)
  - e) Copies of Garda Vetting disclosures and Vetting Application Forms
  - f) Proof of Identify (copy of approved ID)
  - g) The full title of the qualification(s) and the year obtained
  - h) Name of the educational institution providing the qualification(s)
  - i) Names of academic staff delivering the qualification(s)
  - j) Course programme or syllabus

---

<sup>1</sup> Data Protection Commission, 'Lawful Basis for Processing Personal Data', *Data Protection Commission Website*, 2020; available from <https://www.dataprotection.ie/en/organisations/know-your-obligations/lawful-processing>; accessed 18 March 2020.

- k) College transcript(s) of results
- l) Details of interpreting experience to date, including years of experience, domains of interpreting, CPD activities carried out
- m) Involvement in the Deaf community since obtaining their qualification
- n) Any other documents deemed necessary and proportionate

3.5 Specifically in the case of **CPD documentation and evidence**, the personal information we collect might include the following documentation and evidence, further described in the *Continuing Professional Development Policy* (but is not limited to):

- a) Completed Personal Learning Plans (PLPs)
- b) Completed CPD Logs, which will include a note of what CPD the registrant did, and when, providing the name and a brief description of the CPD activity. Also noted is whether the CPD activity was Structured, Unstructured, or Deaf Community Engagement (DCE), as well as dates, times and duration spent on the activity.
- c) Evidence of Structured CPD activities including but not limited to:
  - i. certificates of completion
  - ii. copies of qualifications,
  - iii. email from organiser confirming attendance
  - iv. signatures on your CPD Log
- d) Evidence of Unstructured CPD activities (i.e. completed Reflective Journal entry, or a similarly structured piece of reflective writing in English or video in Irish Sign Language)
- e) Evidence of Deaf Community Engagement (DCE) will be provided through a DCE Irish Sign Language (ISL) Video Diary video clips). Information in the DCE Video Diary will include:
  - i. The setting where the event took place (community centre, pub, café, etc.)
  - ii. A brief description of the event, numbers of people present, etc.
  - iii. A brief description of the interpreter's interactions e.g. if they were in a group conversation
  - iv. Any new vocabulary they learned, any variation of ISL you have seen used, grammatical information etc.
  - v. signatures on your CPD Log
- f) Any other documents deemed necessary and proportionate

3.6 Specifically in the case of **Work Practice documentation and evidence**, the personal information we collect might include (but is not limited to) the following documentation and evidence, further described in *Registration Process*:

- a) Letters from interpreting agency confirming the completion of interpreting hours/assignments by the registrant
- b) Invoices for work completed by the registrant
- c) Letter from employer or organisation confirming completion of interpreting hours/assignments by the registrant

- d) Interpreting attendance sheets signed by appropriate contact person or signatory at the interpreting assignment (court clerk, medical consultant, etc.), or organiser of event, confirming attendance by the registrant
  - e) Any other documents deemed necessary and proportionate
- 3.7 Specifically in the case of candidates for **Skills Checks**, the personal information we collect might include (but is not limited to) the following forms, video footage, and other documentation, as described in the— *Procedures and Skills Checks – Procedures*:
- a) Information listed in 3.4 above, application for registration
  - b) Skills Check-related video footage of interviews or practical interpreting assessments
  - c) Papers and notes from Skills Checks related interviews
  - d) Documentation and results from Skills Checks related Knowledge Exams
  - e) Correspondence in relation to Skills Checks
  - f) Any other documents deemed necessary and proportionate
- 3.8 Specifically in the case of **complaints** to the Complaints Sub-Committee and appeals to the Appeals Panel, the personal information we collect might include (but is not limited to):
- a) Complaints Form (in written form or ISL video)
  - b) Complainant's name
  - c) Complainant's contact details
  - d) The name of the respondent (the registered interpreter) the complaint is about
  - e) What happened - a description of the incident, action, or behaviour that occurred
  - f) When and where it happened
  - g) If anybody else was present who witnessed the incident or behaviour
  - h) The interpreting agency or employer (if known) which arranged for the respondent to be there
  - i) The complainant's desired outcome from the complaints process
  - j) the Respondent Submission
  - k) the Complainant Response submission
  - l) Evidence hearing transcripts and recordings
  - m) Any of the range of submissions, notices or reports (in written English format or ISL versions) produced by the registrant, the complainant (in the case of a complaint made against a registrant), any external consultants, the Complaints Sub-Committee, the Board of Directors, the Registration Panel, the Appeals Subcommittee, external consultant or other individuals, or the Secretariat, during the course of one of the Complaints or Appeals Processes described in the Complaints and Mediation Processes and the Appeals Processes
- 3.9 Specifically in the case of **Skills Checks assessments**, the personal information we collect might include
- a) Recordings of practical assessments of interpreting, ISL to spoken English
  - b) Recordings of practical assessments of interpreting, spoken English to ISL
  - c) Recordings of practical assessments of sight translation, ISL to written English
  - d) Recordings of practical assessments of sight translation, written English to ISL
  - e) Recordings of practical assessments of skills in interpreting within ISL / between different variants of ISL
  - f) Written tests (Multiple Choice Questions / Sample Scenario-based open question)
  - g) Recordings of 'Role-play' mock scenarios

- h) Other such assessments deemed necessary and appropriate.
  - i) Any of the range of interview notes, results, recordings or reports (in written English format or ISL) produced by the registrant, Panel of Assessor members, the Board of Directors, the Registration Panel, other individuals, or the Secretariat, during the course of one of the various Skills Check assessments. *See Skills Checks – Procedures for more information.*
  - j) Any other documents deemed necessary and proportionate
- 3.10 The **accuracy of your information** is important. If a registrant/applicant changes contact details, or any of the other information held is inaccurate or out of date, registrants are encouraged to contact us using the contact details above in Section 1.3.
- 3.11 We obtain **information about service users** usually in the context of complaints. The information collected comprises of the personal data provided to us by the service user and will normally include (but is not limited to) contact details, names and address. Information provided by the service user may be provided to the registrant during the course of the complaints process.
- 3.12 We collect information from applicants for membership of the Registration Panel, in the context of receiving Expression of Interest applications for panel membership. The information collected comprises of the personal data provided to us by the applicant and will normally include (but is not limited to) contact details, names, referees, professional experience and other information provided in the course of an application process.

## Section 4: Use of Information

- 4.1 We primarily collect personal information to fulfil the purpose of protecting users of interpreting services, primarily the Deaf community and service providers, through a standards-based registration process for sign language interpreters. *See Register – Values and Governance.*
- 4.2 Registrants' personal information will generally be used to:
- a) Confirm that the registrant meets minimum criteria for initial membership of the Register
  - b) Record the starting date of registration
  - c) Record registrant details on the online Register Directory
  - d) Record the registrant's registration status
  - e) Provide a photo ID card to registrant
  - f) Provide information, support and advice to registrants
  - g) Provide information regarding upcoming CPD opportunities to registrants
  - h) Send emails and newsletters regarding RISLI's work
  - i) Confirm that the registrant meets minimum requirements in relation to CPD and Work Practice
  - j) Consider and investigate any complaints or appeals brought against a registrant
  - k) Record evidence of termination of registration
  - l) For other reasons in accordance with law

We retain the right to verify any and all documentation /evidence submitted as part of your application or for the maintenance of your registration.

- 4.3 We offer an **online Register Directory** at [www.risli.ie](http://www.risli.ie), for members of the public to search for interpreters to work with. The public can search on the online Register Directory for an interpreter they may be working with, to check whether they are registered, and whether their registration (with any condition attached) is appropriate for the assignment. This Directory can also be used to see the registration status of an interpreter about whose practise they may wish to make a complaint.
- 4.4 Registrants will each have an online profile page on the Register Directory, which will display their name, registration status, date of first registration registration expiry date, and qualification route information. Beyond this, further information about an interpreter can be displayed in this search, but only if the registrant has opted in to such information being made available publicly. Please see *Registration Process*, Appendix 1 (Registration Application Form). Registrants can choose which information they wish to be displayed on their profile page at the point of registration, and can change or opt out of any of these features at any time.
- 4.5 If a **Condition is attached to a registrant's registration** (see *Registration Process* Section 4, '*Conditions Attached to Registration*'), the interpreter's Directory profile page may display the existence of a Condition accordingly, which may be publicly visible if searched. The details of the Condition will not be publicly visible.
- 4.6 If a registrant has been **suspended from the Register**, the interpreter's Directory profile page will indicate a Registration Status of 'Suspended', and will be publicly visible if searched. The date at which the registrant's suspension will be lifted will also be displayed.
- 4.7 Where a **registrant has been removed** from the Register (for example via a Complaints Sub-Committee finding), or a registrant by choice removes themselves from the Register, that registrant's profile page will be removed from the online Register Directory, and will be no longer publicly visible if searched. Interpreters no longer on the Register will not come up in any website search, and we are unable to provide any assurance as to their professional competence.
- 4.8 We will use collected information relating to the Register to support understanding of the demographics, national distribution, and development of the interpreting profession. We may share this information with other organisations, at their discretion in furthering the aims and objectives of the registration system. Individuals will never be identified when information is used in this way.
- 4.9 Personal information may be used for identity verification purposes when registrants are in contact with queries, depending on the nature of the enquiry. This may occur when, for example, registrants are asked for certain information known only to them, in the course of a telephone enquiry.
- 4.10 Additionally, registrant information may be used to:
- a) carry out regulatory checks in accordance with our functions
  - b) develop and improve services
  - c) improve the relevance of information messages sent to registrants
  - d) personalise RISLI's website for registrants
  - e) protect our systems

- 4.11 We may also monitor, record, or take a written note of communications with registrants, including telephone or video calls. These records will be used to keep track of mutual undertakings, to analyse, assess and improve the services of the registration system, and for training and quality purposes.
- 4.12 We will communicate with registrants by email, text, telephone, video call, post and other digital methods. These messages may be:
- a) to help registrants manage their registration
  - b) to carry out any regulatory functions
  - c) to keep registrants informed about the features and benefits of registration, services, upcoming CPD events, and other matters that may be of professional interest.
- 4.13 We will never pass on registrants' information to any **third party** for use in their direct marketing without registrants' specific consent. In carefully considered circumstances, we may however pass information to registrants on behalf of a third party, if it is broadly in the interests of regulation and the interpreting profession.
- 4.14 Personal data may be disclosed to the following categories of recipients:
- a) Service user's personal data may be disclosed to registrants in the context of complaints (and vice versa)
  - b) To service providers such as outsourced IT providers, accountants, legal and governance advisors, auditors etc.
  - c) To any competent law enforcement body, regulator, government agency, court or other third party where we believe disclosure is necessary:
    - i. as a matter of applicable law or regulation
    - ii. to exercise, establish or defend our legal rights
    - iii. to protect your vital interests or those of any other person
- 4.15 We do not transfer personal data outside of the EEA. To the extent that any transfers take place in the future, the transfers will take place in accordance with Chapter 5 of the GDPR.

## Section 5: Retention of Information

- 5.1 Copies of qualification certificates, references, intake session video clips and interview papers are retained for as long as the registrant remains on the Register and for a period of 24 months thereafter. Subsequently, this material is securely destroyed or deleted unless otherwise required.
- 5.2 Copies of logs, plans, journals, video diaries, and evidence of CPD activities and Work Practice hours are retained for 12 months beyond the end of the relevant CPD/Work Practice Cycle. Thereafter, this material is securely destroyed or deleted unless otherwise required. It is also expected that all CPD logs/ proof of Work Practice hours will be fully anonymised where reasonably practicable prior to submission so as to protect the identities and interests of any individual referred to.
- 5.3 Copies of forms, submissions, and other notes and correspondence relating to any registrant involved in a complaint/appeal are retained for at least 6 years. Thereafter, this material is securely destroyed or deleted unless otherwise required.



- 5.4 Any other personal information of registrants not covered elsewhere in this section will be retained for as long as the registrant remains on the Register, and in the case of registrants leaving or being removed from the Register, for a period of 24 months after registration has ceased. Thereafter, all remaining personal information is securely destroyed or deleted unless otherwise required.

## Section 6: Who has access to your information?

- 6.1 The individuals that may have access to registrants' personal information contained in their applications to join the Register are:

- a) the Secretariat and such other staff members from RISLI
- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate.

- 6.2 The individuals that may have access to registrants' personal information contained in their Garda Vetting application forms and Vetting Disclosures are:

- a) the Secretariat and such other staff members from RISLI
- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate.

- 6.3 The individuals that may have access to registrants' personal information contained in logs, plans, journals, video diaries, and evidence of CPD activities relating to CPD activities of a registrant are:

- a) the Secretariat and such other staff members from RISLI
- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate

- 6.4 The individuals that may have access to registrants' personal information contained in logs and evidence of Work Practice of a registrant are:

- a) the Secretariat and such other staff members from RISLI
- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate

- 6.5 The individuals that shall have access to registrants' personal information contained in forms, submissions, notes, correspondence, minutes and any other documentation relating to complaints cases and appeals cases involving a registrant are:

- a) the Secretariat and such other staff members from RISLI
- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate

- 6.6 The individuals that shall have access to registrants' personal information contained in any test results, exam transcripts or recordings from any Skills Check assessments involving a registrant, are:

- a) the Secretariat and such other staff members from RISLI

- b) the Board of Directors, members of the Registration Panel and all Committees established as appropriate
- 6.7 Certain categories of personal information (i.e. name, registration status and date of first registration,) are made available through the online Register Directory, and can be viewed by individuals, groups, organisations and bodies seeking access to interpreting services. See *Registration Process, Appendix 1 (Registration Form)*.
- 6.8 Upon the registrant opting in, certain other types of personal information (e.g. personal photo etc.) are also made available through the online Register Directory and can be viewed by individuals, groups, organisations and bodies seeking access to interpreting services. See *Registration Process, Appendix 1 (Registration Form)*.

## Section 7: Will my information be kept confidential?

- 7.1 We will take steps to ensure that any personal information is treated securely. You may ask for a copy of your information at any time.
- 7.2 The following security precautions are in place to protect the loss, misuse or alteration of registrants' information:
- a) Filing cabinets are kept locked when not in use
  - b) Online records are password protected appropriately
  - c) A confidential shredding service is used for data destruction
- 7.3 We will do our best to keep your information confidential but we may need to share your confidential information if:
- a) there is a risk of serious harm to you or to another person or to property
  - b) we have to do so or we are permitted by law
  - c) we have to give evidence in court
  - d) we need to use your information to get legal advice or to defend a legal right
  - e) we are told about harm to a child

We will inform you if we are obliged to share confidential information about you before we do it.

## Section 8: What are your rights with respect to your personal data?

- 8.1 You have the following rights:
- a) The right to access the personal data we hold about you
  - b) The right to require us to rectify any inaccurate personal data about you without undue delay
  - c) The right to have us erase any personal data we hold about you in circumstances such as:
    - i. where it is no longer necessary in relation to the purpose for which it was originally collected/processed
    - ii. if you have withdrawn your consent to the processing
    - iii. where you object to the processing and there is no overriding legitimate interest to continue the processing

- iv. the personal data has to be erased in order to comply with a legal obligation or the personal data was unlawfully processed
- d) In circumstances where we rely on processing being necessary for the performance of a task carried out in the public interest or legitimate interests, you have the right to object to us processing personal data about you
- e) The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to transfer that personal data to another provider, provided it does not result in a disclosure of personal data relating to other people
- f) The right to request a restriction of the processing of your personal data where:
  - i. the accuracy of the personal data is contested by you, the restriction must be in place for a period enabling us to verify the accuracy of the personal data
  - ii. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of the use instead
  - iii. we no longer need the personal data for the purposes of processing, but are required by you for the establishment, exercise or defence of legal claims
  - iv. you have objected to processing related to tasks carried out in the public interest, the restriction must be in place pending the verification whether our legitimate grounds override your rights

8.2 You may exercise any of the above rights or withdraw your consent, in so far as processing is based on consent, at any time by contacting [admin@risli.ie](mailto:admin@risli.ie). Please note that any processing that we have carried out before you withdrew your consent remains lawful.

8.3 You may lodge a complaint with your supervisory authority with respect to our processing of your personal data. The supervisory authority in Ireland is the Data Protection Commission. The website is [dataprotection.ie](http://dataprotection.ie).

## Section 9: What is the Data Protection Consent Form?

Data protection is about keeping your personal information safe. You can find details of how we protect your information in our Data Protection Notice on our website [www.risli.ie](http://www.risli.ie) or ask us for a copy. You will be asked to sign the Data Protection Consent form, as part of your application procedure where relevant. When you sign this form, it shows that you understand and agree with how we will use – and protect – your personal information.

## Section 10: What will happen if we change our Data Protection Notice?

This notice may change from time to time, and any changes will be posted on the [www.risli.ie](http://www.risli.ie) and will be effective when posted. This notice was last updated on 2<sup>nd</sup> December 2020.

## Section 11: Links to other websites

11.1 RISLI's website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our website.

11.2 In addition, if you linked to our website from a 3rd party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that 3rd party site. We recommend that you check the policy of that 3rd party site.