

Effective Date: 1st March 2024

Contents

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

Section 1: Privacy Notice

- 1.1 The Register of 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
- 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, applicants, service users or members 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 controller in respect of data processed. RISLI:

- a) established and maintains the Irish 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 and a code of conduct for interpreters
- 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 supported by a Registration Panel. RISLI is a not for profit organisation funded by the Citizens Information Board under the auspices of the Department of Social Protection. The registered address of RISLI is, Deaf Village Ireland, Ratoath Road, Cabra, Dublin 7.

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

- 3.1 Applicants are Irish Sign Language Interpreters who have completed an application form to join the register and are not yet registered.
Registrants are those ISL interpreters deemed to have achieved the appropriate level of competence to provide ISL services to Deaf people and as such are included on the Register.
Service Users are individuals or government organisations availing of ISL services.
Volunteer members of the Board of Directors have been invited or applied and were selected to join the RISLI Board based on specific skills and experience required for the effective functioning of the Board.
Volunteer members of the Registration Panel have been invited or applied and were selected to join the RISLI Registration Panel based on specific skills and experience required for the effective functioning of the Registration Panel. The Registration Panel exists to support and advise the RISLI Board.
- 3.2 We obtain information about applicants when application forms are received from the applicant. On receipt of the application form the applicant's registration is considered. The information we obtain is to ensure that applicants meet the criteria for maintaining registration (for example, evidence of Work Practised and evidence of completed Continuous Professional Development). If deemed appropriately qualified and/ or experienced the applicant is registered and becomes a registrant.
- 3.3 We obtain information pertaining to the members of the Board and Registration Panel of RISLI as a condition of their membership and in compliance with the CRO and company law. We also maintain information on their suitability to be a Board or Registration Panel member and their area of expertise as required for membership of the Board of Directors or Registration Panel.
- 3.4 The **personal information we collect** from Board or Registration Panel member's might include (but is not limited to):
- a) Board or Registration Panel member's name;
 - b) Board or Registration Panel member's address;
 - c) Board or Registration Panel member's contact number(s);
 - d) Board or Registration Panel member's email address;
 - e) Board or Registration Panel member's date of birth (for Board members);
 - f) Any other documents deemed necessary and proportionate for membership of the Board or Registration Panel.
- 3.5 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 falls under the remit of section 7 of the ISL Act 2017¹. RISLI provides the function of an accreditation scheme and register for Irish Sign Language Interpreters. In so far as legitimate

¹ Irish Sign Language Act 2017, Irish Statute Book no 40 of 2017, accessed 21 February 2024.

interests is concerned, the processing of the registrants and applicants' personal information is necessary to protect users of interpreting services (primarily the Deaf community and service providers). This is achieved through a standards-based registration system for sign language interpreters, and 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 they offer to the Deaf community in a public body proceeding cannot be provided by them. We believe that a registrant/applicant would reasonably expect that this data would be required. Interpreters must agree to their information being processed in order to remain on the register and provide interpreting services to public bodies.

3.6 The **personal information we collect from applicants/registrants might include (but is not limited to):**

- g) Applicant's and registrant's name
- h) Applicant's and registrant's address
- i) Applicant's and registrant's contact number(s)
- j) Applicant's and registrant's email address
- k) Applicant's and registrant's date of birth
- l) Any other documents deemed necessary and proportionate

3.7 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
- 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

3.8 Specifically, in the case of CPD documentation and evidence collected from registrants, the personal information we collect from registrants 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

3.9 Specifically in the case of Work Practice documentation and evidence for registrants, 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

3.10 Specifically in the case of applicants 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

3.11 Specifically in the case of **Skills Checks assessments for registrants**, 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

3.12 The **accuracy of your information** is important. If a applicant/ registrant 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.

Section 4: Use of Information

4.1 In order for RISLI to operate in line with Section 7 of the ISL Act 2017 we will be required to collect and process your information for the purpose of registering you as an accredited ISL interpreter. Information will only be shared publicly with your consent including your name, qualifications/ accreditations, locations you will chose to work, including online, photograph, contact email and phone number. This information will be shared online, with your consent, in order for you to be accessed as an interpreter for public bodies.

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) Record evidence of termination of registration
- k) 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, 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.
- 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 into 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 Where 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.
- 4.7 We may use collected information, in an anonymised format, to inform the provision of good quality interpreting services nationally. This may include demographics, national distribution, qualifications attained by interpreters, and other qualifications held by interpreters. This information will be used to enhance the quality of interpreting provision and educational options for interpreters. We may share this information with select third parties who share a common interest in furthering interpreting services for the Deaf Community.
- 4.8 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.
- 4.9 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
- 4.10 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.
- 4.11 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.
- 4.12 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.
- 4.13 Personal data may be disclosed to the following categories of recipients:
- a) To service providers such as outsourced IT providers, accountants, legal and governance advisors, auditors etc.
 - b) 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
- 4.14 We do not transfer personal data outside of the EEA. To the extent that any transfers may take place in the future, all parties will give informed consent. Any information shared with agencies in the U.K. will be protected under the UK adequacy provision adopted by the European Commission.

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. Due to the nature of the interpreting work and the likelihood of coming in contact with vulnerable clients, RISLI requires a 24-month period in case the interpreter must be contacted to clarify or engage in a statutory process (e.g. Health and safety query, safeguarding query or similar).
- Copies of qualification certificates, references, intake session video clips and interview papers for unsuccessful applicants are retained for 12 months to allow for potential upskilling and as such admission to the register.
- Copies of information for applications of unsuccessful Board Members or Registration Panel members are retained for 24 months following the filling of the positions on the Registration Panel or Board. This will be retained to create a panel should another Board member with similar skills need to withdraw.
- 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 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, this is to allow for engagement in any statutory process (e.g. Health and Safety, Safeguarding). Thereafter, all remaining personal information is securely destroyed or deleted unless otherwise required.
- 5.4 A registrant may choose to allow RISLI to retain their information where they expect to return to practice after a prolonged absence, all necessary skills checks will be required in this instance.

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 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
- 6.6 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)*.

- 6.7 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 appropriate technical and organisational measures are in place to ensure a level of security for personal information appropriate to the risk
- 7.2 The following security precautions are in place to protect the loss, misuse or alteration of registrants' information:
- a) Filing cabinets are kept in a locked office
 - b) Filing cabinets are kept locked when not in use
 - c) Online records are password protected appropriately
 - d) Online access is limited to employees that require the information (The RISLI Board and Registration Panel are not employees, they are volunteers)
 - e) A confidential shredding service is used for data destruction
 - f) Computers and laptops are password protected at point of entry
- 7.3 we may need to share your information if there is a legal obligation compelled upon RISLI to do so, for example:
- 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 or potential harm to a child

We will inform you if we share your information with a third party for the reasons outlined above or outlined in section 4.14.

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

- 8.1 You have the following rights:
- a) The right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and information about the processing
 - 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 or legitimate interests, 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. 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.

Section 9: What is the Data Protection Consent Form?

9.1 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 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?

10.1 This notice may change from time to time. We will provide you with notice of amendments to this Privacy Policy, as appropriate, and update the “Effective Date” at the top of this Privacy Policy. The revised Privacy Policy will be posted on the www.risli.ie and will be effective when posted. This notice was last updated on 1st March 2024.

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.