

Data protection destruction notice in relation to apprentice hairdressing documentation retained by the Court.

Since 1977 the Labour Court have facilitated the Hairdressing Joint Labour Committee (JLC) by registering workers and providing them with certificates of registration.

The Court holds the following documentation in relation to the registration of apprentice hairdressers;

Registers

White cards

Certificates of Registration

All data including personal data relating to the registration of apprentice hairdressers was held indefinitely.

On the 17 August 2019 the Court determined that it cease with immediate effect to maintain and administer a register of apprentice hairdressers and that the register be closed with immediate effect.

The emphasis under the General Data Protection Regulation (the “GDPR”) and data protection law in general is data minimisation, both in terms of the volume of data stored on individuals and how long it is retained. Article 5 (1)(e) of the GDPR states that “Personal data shall be kept for no longer than is necessary for the purposes for which the personal data are processed. “

Recital 39 of the GDPR states that the period for which the personal data is stored should be limited to a strict minimum and that time limits should be established by the data controller for deletion of the records or for a periodic review of the records in relation to the need by the data controller to continue to retain these records.

The Labour Court has undertaken a review of the data held by it on apprentice hairdressers and the reason for the retention of these records. Further to this review, the Labour Court has concluded that its collection and retention of these records is no longer necessary for the purposes for which they were

originally collected and processed and accordingly has decided that these records should now be destructed by way of confidential shredding in line with best practice record management procedures and document destruction laws, following authorisation from the Director or Designated Officer of the National Archives office.

Signed: Jacqui Kelly, Registrar to Labour Court

December 2019