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Reg. Charity No: 20125127



Scoil Bhríde N.S., Lisdowney

Data Protection Policy

Introductory Statement

The school's Data Protection Policy applies to the personal data held by the school which is protected by the Data Protection Acts 1988 to 2003 and the EU General Data Personal Regulation 2018

The policy applies to all school staff, the board of management, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school) insofar as the measures under the policy relate to them. Data will be stored securely, so that confidential information is protected in compliance with relevant legislation. This policy sets out the manner in which personal data and sensitive personal data will be protected by the school.

Data Protection Principles

The school is a *data controller* of *personal data* relating to its past, present and future staff, students, parents/guardians and other members of the school community. As such, the school is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 and 2003 and the EU GDPR 2018 which can be summarised as follows:

Obtain and process *Personal Data* fairly: Information on students is gathered with the help of parents/guardians and staff. Information is also transferred from their previous schools (if any). In relation to information the school holds on other individuals (members of staff, individuals applying for positions within the School, parents/guardians of students etc.), the information is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with the School. All such data is treated in accordance with the Data Protection Acts and the terms of this Data Protection Policy. The information will be obtained and processed fairly.

Consent: Where consent is the basis for provision of personal data the consent must be given freely, specific, informed and clear indication of the data subject's wishes. Individuals will be required to sign a document to indicate consent. Consent may be withdrawn at any stage.

Keep it only for one or more specified and explicit lawful purposes: The School will inform individuals of the reasons they collect their data and will inform individuals of the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.

Process it only in ways compatible with the purposes for which it was given initially: Data relating to individuals will only be processed in a manner consistent

with the purposes for which it was gathered. Information will only be disclosed on a need to know basis, and access to it will be strictly controlled.

Keep *Personal Data* safe and secure: Only those with a genuine reason for doing so may gain access to the information. Sensitive Personal Data is securely stored under lock and key in the case of manual records and protected with firewall software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) should be encrypted and password protected before they are removed from the school premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data.

Keep Personal Data accurate, complete and up-to-date: Students, parents/guardians, and/or staff should inform the school of any change which the school should make to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records. The principal may delegate such updates/amendments to another member of staff. However, records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation should be dated and signed by the person making that change.

Ensure that it is adequate, relevant and not excessive: Only the necessary amount of information required to provide an adequate service will be gathered and stored.

Retain it no longer than is necessary for the specified purpose or purposes for which it was given: As a general rule, the information will be kept for the duration of the individual's time in the school. Thereafter, the school will comply with DES guidelines on the storage of Personal Data and Sensitive Personal Data relating to a student. In the case of members of staff, the school will comply with both DES guidelines and the requirements of the Revenue Commissioners with regard to the retention of records relating to employees. The school may also retain the data relating to an individual for a longer length of time for the purposes of complying with relevant provisions of law and/or defending a claim under employment legislation and/or contract and/or civil law.

Provide a copy of their personal data to any individual, on request: Individuals have a right to know what personal data/sensitive personal data is held about them, by whom, and the purpose for which it is held.

Scope

Purpose of the Policy: The Data Protection Acts 1988 and 2003 and GDPR 2018 apply to the keeping and processing of *Personal Data*, both in manual and electronic form. The purpose of this policy is to assist the school to meet its statutory obligations, to explain those obligations to School staff, and to inform staff, students and their parents/guardians how their data will be treated.

The policy applies to all school staff, the board of management, parents/guardians, students and others (including prospective or potential students and their parents/guardians, and applicants for staff positions within the school) insofar as the school handles or processes their *Personal Data* in the course of their dealings with the school.

Definition of Data Protection Terms

In order to properly understand the school's obligations, there are some key terms which should be understood by all relevant school staff:

Data means information in a form that can be processed. It includes both *automated data* (e.g. electronic data) and *manual data*. **Automated data** means any information on computer, or information recorded with the intention that it be *processed* by

computer. **Manual data** means information that is kept/recorded as part of a **relevant filing system** or with the intention that it forms part of a relevant filing system.

Relevant filing system means any set of information that, while not computerised, is structured by reference to individuals or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily, quickly and easily accessible.

Personal Data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller i.e. BOM

Sensitive Personal Data refers to Personal Data regarding a person's

- racial or ethnic origin, political opinions or religious or philosophical beliefs
- membership of a trade union
- physical or mental health or condition or sexual life
- commission or alleged commission of any offence or any proceedings for an offence committed or alleged to have been committed by the person, the disposal of such proceedings or the sentence of any court in such proceedings, criminal convictions or the alleged commission of an offence.

Data Controller for the purpose of this policy is the board of management, of Scoil Bhríde N.S. Lisdowney.

Rationale

In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the Data Protection Acts, 1988 and 2003 and GDPR 2018

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared. As more and more data is generated electronically and as technological advances enable the easy distribution and retention of this data, the challenge of meeting the school's legal responsibilities has increased. The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the principal and board of management to make decisions in respect of the efficient running of the School. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and board of management.

Other Legal Obligations

Implementation of this policy takes into account the school's other legal obligations and responsibilities. Some of these are directly relevant to data protection. *For example:*

- Under Section 9(g) of the Education Act, 1998, the parents of a student, or a student who has reached the age of 18 years, must be given access to records kept by the school relating to the progress of the student in their education
- Under Section 20 of the Education (Welfare) Act, 2000, the school must maintain a register of all students attending the School

- Under section 20(5) of the Education (Welfare) Act, 2000, a principal is obliged to notify certain information relating to the child's attendance in school and other matters relating to the child's educational progress to the principal of another school to which a student is transferring. Scoil Bhríde N.S., Lisdowney emails a copy of a child's passport as outlined by NCCA once requested by the secondary school when they confirm enrolment of said child. Reports completed by professionals outside Scoil Bhríde N.S., Lisdowney will only be passed on when written permission has been given by both parents/guardians of a child.
- Under Section 21 of the Education (Welfare) Act, 2000, the school must record the attendance or non-attendance of students registered at the school on each school day
- Under Section 28 of the Education (Welfare) Act, 2000, the School may supply *Personal Data* kept by it to certain prescribed bodies (the Department of Education and Skills, the National Education Welfare Board, the National Council for Special Education, other schools, other centres of education) provided the School is satisfied that it will be used for a "relevant purpose" (which includes recording a person's educational or training history or monitoring their educational or training progress in order to ascertain how best they may be assisted in availing of educational or training opportunities or in developing their educational potential; or for carrying out research into examinations, participation in education and the general effectiveness of education or training)
- Under Section 14 of the Education for Persons with Special Educational Needs Act, 2004, the school is required to furnish to the National Council for Special Education (and its employees, which would include Special Educational Needs Organisers ("SENOs")) such information as the Council may from time to time reasonably request
- The Freedom of Information Act 1997 provides a qualified right to access to information held by public bodies which does not necessarily have to be "personal data" as with data protection legislation. While schools are not currently subject to freedom of information legislation, if a school has furnished information to a body covered by the Freedom of Information Act (such as the Department of Education and Skills, etc.) these records could be disclosed if a request is made to that body
- Under Section 26(4) of the Health Act, 1947 a school shall cause all reasonable facilities (including facilities for obtaining names and addresses of pupils attending the school) to be given to a health authority who has served a notice on it of medical inspection, e.g. a dental inspection
- Under *Children First: National Guidance for the Protection and Welfare of Children* (2011) published by the Department of Children & Youth Affairs, schools, their boards of management and their staff have responsibilities to report child abuse or neglect to TUSLA - Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

Relationship to characteristic spirit of the School

Scoil Bhríde, Lisdowney NS seeks to

- enable each student to develop their full potential

- provide a safe and secure environment for learning
- promote respect for the diversity of values, beliefs, traditions, languages and ways of life in society.

We aim to achieve these goals while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us. The school wishes to achieve these aims/missions while fully respecting individuals' rights to privacy and rights under the Data Protection Acts.

Personal Data

The *Personal Data* records held by the school **may** include:

Staff records:

- **Categories of staff data:** As well as existing members of staff (and former members of staff), these records may also relate to applicants applying for positions within the school, trainee teachers and teachers under probation. These staff records may include:
 - Name, address and contact details, PPS number
 - Original records of application and appointment to promotion posts
 - Details of approved absences (career breaks, parental leave, study leave etc.)
 - Details of work record (qualifications, classes taught, subjects etc.)
 - Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their school duties
 - Records of any reports the school (or its employees) have made in respect of the staff member to State departments and/or other agencies under mandatory reporting legislation and/or child-safeguarding guidelines (subject to the DES Child Protection Procedures).

Purposes: Staff records are kept for the purposes of:

- the management and administration of school business (now and in the future)
- to facilitate the payment of staff, and calculate other benefits/ entitlements (including reckonable service for the purpose of calculation of pension payments, entitlements and/or redundancy payments where relevant)
- to facilitate pension payments in the future
- human resources management
- recording promotions made (documentation relating to promotions applied for) and changes in responsibilities etc.
- to enable the school to comply with its obligations as an employer including the preservation of a safe, efficient working and teaching environment (including complying with its responsibilities under the Safety, Health and Welfare At Work Act. 2005)
- to enable the school to comply with requirements set down by the Department of Education and Skills, the Revenue Commissioners, the National Council for Special Education, TUSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies
- and for compliance with legislation relevant to the school.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.

Digital records are stored on password protected computer and programmes.

Security: The school has a monitored alarm system

Student records:

Categories of student data: These may include:

- Information which may be sought and recorded at enrolment and may be collated and compiled during the course of the student's time in the school. These records may include:
 - name, address and contact details, PPS number
 - date and place of birth
 - names and addresses of parents/guardians and their contact details (including any special arrangements with regard to guardianship, custody or access)
 - religious belief
 - racial or ethnic origin
 - membership of the Traveller community, where relevant
 - whether they (or their parents) are medical card holders
 - whether English is the student's first language and/or whether the student requires English language support
 - any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply
- Information on academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements).
- Academic record – Drumcondra Mathematics and English attainment tests.
- Records of significant achievements
- Whether the student is repeating a class.
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Other records e.g. records of any serious injuries/accidents etc. (Note: it is advisable to inform parents that a particular incident is being recorded).
- Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).

Purposes: The purposes for keeping student records are:

- to enable each student to develop to their full potential
- to comply with legislative or administrative requirements
- to ensure that eligible students can benefit from the relevant additional teaching or financial supports
- to support the provision of religious instruction
- to enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or to inform parents of school events etc.
- to meet the educational, social, physical and emotional requirements of the student
- Photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and keep a record of the history of the school.

- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirements for beginning school,
- to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- to furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other Schools etc. in compliance with law and directions issued by government departments
- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/ references to second level.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access. Digital records are held on a password protected computer and password protected programmes.

Security: The school has a monitored alarm system

C. Board of Management records:

Categories of board of management data: These may include:

- Name, address and contact details of each member of the board of management (including former members of the board of management)
- Records in relation to appointments to the Board
- Minutes of Board of Management meetings and correspondence to the Board which may include references to particular individuals.

Purposes: To enable the Board of Management to operate in accordance with the Education Act 1998 and other applicable legislation and to maintain a record of board appointments and decisions.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.

Digital records are held on a password protected computer and password protected programmes.

Security: The school has a monitored alarm system

Other records:

Creditors

(a) **Categories of data:** the school may hold some or all of the following information about creditors (some of whom are self-employed individuals):

- name
- address
- contact details
- PPS number
- tax details
- bank details and
- amount paid.

Purposes: This information is required for routine management and administration of the school's financial affairs, including the payment of invoices, the compiling of annual financial accounts and complying with audits and investigations by the Revenue Commissioners.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.

Digital records are held on a password protected computer and password protected programmes.

Security: The school has a monitored alarm system

Charity tax-back forms

Categories of data: the school may hold the following data in relation to donors who have made charitable donations to the school:

- name
- address
- telephone number
- PPS number
- tax rate
- signature and
- the gross amount of the donation.

Purposes: Schools are entitled to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY2) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation. The information requested on the appropriate certificate is the parents name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the School in the case of audit by the Revenue Commissioners.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.

Digital records are held on a password protected computer and password protected programmes.

Security: The school has a monitored alarm system

CCTV images/recordings

Categories:

CCTV is installed in the lobby, externally i.e. on the yard, perimeter walls/fencing and internally as detailed in the CCTV Policy. These CCTV systems may record images of staff, students and members of the public who visit the premises.

Purposes: Safety and security of staff, students and visitors and to safeguard school property and equipment.

Location: Cameras are located externally and internally. Recording equipment is located in the classroom.

Security: Access to images/recordings is restricted to the principal & deputy principal. Tapes, DVDs, hard disk recordings are retained for 28 days, except if required for the investigation of an incident. Images/recordings may be viewed or made available to An Garda Síochána pursuant to section 8 Data Protection Acts 1988 and 2003.

Assessment/Diagnostic test

Categories: The school will hold data comprising assessment results in respect of its students. These include Drumcondra attainment NRIT MICRAT, MIST, Diagnostic tests and class Teacher devised tests.

Purposes: The main purpose for which these results and other records are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about attainment levels and recommendations for the future. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and such other similar bodies.

Location: Manual records are held in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access. Digital records are held on a password protected computer and password protected programmes.

Security: The school has a monitored alarm system

Links to other policies and to curriculum delivery

Our school policies need to be consistent with one another, within the framework of the overall School Plan. Relevant school policies already in place or being developed or reviewed, shall be examined with reference to the data protection policy and any implications which it has for them shall be addressed when being examined in the future. The Data Protection requirements 2018 will be adhered to with all policies.

The following policies may be among those considered:

- Child Protection Policy
- Anti-Bullying Policy
- Code of Behaviour
- Assessment Policy
- Admissions/Enrolment Policy
- CCTV Policy
- ICT Acceptable Usage Policy
- SPHE etc.
- Critical Incident Policy
- SEN Policy

Processing in line with data subject's rights

Data in this school will be processed in line with the data subjects' rights.

Data subjects have a right to:

- Know what data is held by the school
- Request access to any data held about them by a data controller
- Prevent the processing of their data for direct-marketing purposes
- Ask to have inaccurate data amended
- Prevent processing that is likely to cause damage or distress to themselves or anyone else.

Data Processors

Where the school outsources to a data processor offsite, it is required by law to have a written contract in place i.e., Written Third Party service agreement. See Appendix) This third party agreement specifies the conditions under which the data

may be processed, the security conditions attaching to the processing of the data and that the data must be deleted or returned upon completion or termination of the contract

Personal Data breaches

All incidents in which personal data has been put at risk must be reported to the office of the Data Protection Commissioner within 72 hours. When the personal data breach is likely to result in a high risk to the rights and freedoms of individuals the Board of Management must communicate the personal data breach to the data subject without undue delay. If the data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (Board of Management) without undue delay

Dealing with a data access request

Individuals are entitled to a copy of their personal data on written request.

The individual is entitled to a copy of their personal data. Request must be responded to within 40 days Where a subsequent or similar request is made soon after a request has just been dealt with, it is at the discretion of the school as data controller to comply with the second request (no time limit but reasonable interval from the date of compliance with the last access request.) This will be determined on a case-by-case basis. No personal data can be supplied relating to another individual unless that third party has consented to the disclosure of their data to the applicant. Data will be carefully redacted to omit references to any other individual and only where it has not been possible to redact the data to ensure that the third party is not identifiable would the school refuse to furnish the data to the applicant.

Providing information over the phone

Any employee dealing with telephone enquiries should be careful about disclosing any personal information held by the school over the phone. In particular the employee should:

- Check the identity of the caller
- Ask the caller put their request in writing
- Refer the request to the principal for assistance in difficult situations.
- Not feel forced into disclosing personal information.

Implementation arrangements, roles and responsibilities

The Board of Management is the data controller and the Principal will be assigned the role of co-ordinating implementation of this Data Protection Policy and for ensuring that staff who handle or have access to *Personal Data* are familiar with their data protection responsibilities.

The following personnel have responsibility for implementing the Data Protection Policy:

Name	Responsibility
<i>Scoil Bhríde N.S. Lisdowney</i>	
<i>Board of Management:</i>	Data Controller
<i>Principal:</i>	Implementation of Policy
<i>Teaching personnel:</i>	Awareness of responsibilities
<i>Administrative personnel:</i>	Security, confidentiality

Ratification & Communication

This policy was ratified at a Board of Management meeting on July 8th 2019 and signed by Chairperson Brian Lyons

Monitoring and implementation of the policy

Scoil Bhríde, Lisdowney NS Data Protection Policy
2019

The implementation of this policy will be monitored by the Principal, staff and Board of Management,

Reviewing and evaluating the policy

The policy will be reviewed and evaluated as necessary. On-going review and evaluation should take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB), legislation and feedback from parents/guardians, students, school staff and others. The policy should be revised as necessary in the light of such review and evaluation and within the framework of school planning.

Signed: _____ **Date:** _____

For and behalf of Board of Management

Appendix 1
Scoil Bhríde N.S., Lisdowney Data Protection Policy

Data item	How collected	Legal basis for collection	Where stored	Physical location	Shared with	Retention period
Pupil personal data Name DoB Address PPSN	Enrolment form	Necessity in the public interest	Enrolment application Roll book Register Class lists Yard book Aladdin administration software Office filing cabinet Class filing cabinet Office computer Class computer DES POD	Office Classroom	DES HSE DSP	Indefinite on Roll books and registers
Pupil Special Category Data Religion Ethnic Data	Enrolment form	Consent	Enrolment application Aladdin administration software Office filing cabinet Class filing cabinet Office computer Class computer DES POD	Office Classroom	DES on consent	25 years on enrolment form
Parental Data Name Address Phone No.s email	Enrolment form	Necessity in the public interest and Protection of the vital interest of the individual	Enrolment application Register Aladdin administration software Office filing cabinet Class filing cabinet Office computer	Office Classroom	DES HSE DSP	Indefinite on school register
Teacher Data Name Address Phone No. Email PPSN Application form CV Seniority list Promotions	Recruitment process Annual update	Necessity in the public interest and contract	School administration software Office computer Office filing cabinet	School office	DES	Duration of the Teacher's employment + 7 years
BoM members Name Address Phone No.s	BoM appointment process	Necessity in the public interest	Office filing cabinet Office computer	Office Strong room	DES Patron Charities Regulator	Indefinite on BoM Minutes

email						
Service Providers (repairs, builders, maintenance contractors) Name Address Phone No. email	When seeking tenders Given willingly	Contract and protection of the vital interest of the individual	Office filing Office computer	Office	BOM Tradespeople with connected activities	While the service provider is being employed with the BoM
Individual pupil Assessment and Report carried out by third party professional S & L Therapist OT Psychologist Etc.,	Parents and school staff	Necessity in the public interest	Office SEN filing Classroom filing Administration software Aladdin	Office SEN classroom Classrooms	DES NCSE	Indefinitely
School supplies companies Reps Name Address Phone No. email	Given willingly by data processor	Consent	Office Computer and filing	Office Classrooms	Staff BoM Parents association	While company rep is dealing with the school
Data Processor (School Administration software; School accounting; School photographs videos Name Address Phone No. Email	Given willingly by data processor	Contract and consent	Office Computer and filing	Office Classrooms	Administration staff BOM	While as long as the data involved is being processed on behalf of BOM
Emergency services Local doctor Name Address Phone No. Email	Given willingly by arrangement	Protection of vital interest of the individual	Office Computer and filing	Office Classroom	BOM Administration staff Teachers	For as long as doctor is being used as emergency service for the school
Pupils' school work; yearly assessments and reports	Part of the work of the school	Necessity in the public interest	Office Computer and filing	Office Classrooms Office computer Classroom computer	Parents Pupils DES NCSE Other schools to where pupils transfer	Until the pupil reaches 25 years of age
Pupils' accident reports	Recorded at the time of the incident	Compliance with legal obligations	Office Office computer Yard incident book	Office Classroom staffroom	Parents medical personal insurers HAS Medical emergency personnel if necessary	Indefinitely
Pupil's notes under	Recorded at the time of	Compliance with legal	Secure offline filing cabinet	School office	TUSLA Gardaí	Indefinitely

Children First	concern	obligations			Parents	
Pupil's school attendance records	Recorded daily on Aladdin software and class lists Yard list	Compliance with legal obligations	Roll books Office filing Classroom and office computers	Office Classroom	TUSLA Parents DES	Until pupil is 25 Until pupil attains 25 years of age
Pupils' medical details and details regarding any additional condition	On enrolment or as soon as details are known	Protection of the vital interest of the individual	Office filing and computer Classroom filing	Office Classroom	Staff NCSE Medical emergency personnel	Until the pupil attains 25 years of age
Pupils' IEPs	Parents Teachers Additional professionals who assess the pupil	Necessity in the public interest	Office filing Office computer Classroom filing SEN computer SEN Filing	School office Classrooms	Pupils Parents Teachers NCSE DES	Indefinitely
Staff members' accident reports	Recorded at the time of the incident	Compliance with a legal obligation	Office filing Office computer	School office	Medical personnel School insurer HAS	Indefinitely
Staff Medical details, certs and details regarding any special condition Staff and volunteers vetting disclosures	From staff members, medical personnel and Medmark	Compliance with a legal obligation and contract compliance with a legal obligation and contract	Office filing Office computer	School office	DES BOM	Duration of staff member's employment + 7 years
Correspondence between parents and teachers in relation to educational matters	From Parents and Staff	Necessity in the public interest. Provision of education	Classroom filing Office filing	Classroom Office	Principal BOM	Until issue is dealt with
Records of complaints made by parents guardians	From Parents/ Guardians	To comply with Complaints procedures	Classroom filing Office filing	Classroom Office	Principal BOM School Insurers Legal Advisor	Depends entirely on the nature of the complaint. If it is a child safeguarding , a complaint relating to a teacher handling, or an accident retain indefinitely

Scoil Bhríde N.S., Lisdowney Data Protection Policy

Appendix 2 Written third party service agreement

- In accordance with the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (GDPR), the BoM of Redwood NS requires this written third party service agreement to be in place with all our data processors

The GDPR requires that the BoM shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of GDPR and thus ensure the protection of the rights of the data subject

The BoM of Scoil Bhríde N.S., Lisdowney as data controller imposes the following minimum obligations on you as data processor:

- To act only on the documented instructions of the data controller i.e. the BoM of Redwood NS with regard to the subject-matter, the types of personal data processed, the documented purposes of the processing and the duration of the processing
- To comply with the obligations imposed on data controllers by the Data Protection Acts 1988 to 2018 and the GDPR in order to ensure that appropriate steps are taken to ensure the confidentiality of the personal data being processed and to guard against the accidental destruction, damage or loss of personal data
- To provide sufficient guarantees in respect of technical security measures and organisational measures governing the processing of the school's data
- To provide an indemnity to the school Board of Management (BoM) for any breaches of the above legal conditions
- To commit to the provision of assistance where appropriate to enable the school Board to comply with a data subject access request
- To immediately contact the school principal where there are any data security breaches in the data processor's company in order to facilitate the school BoM, as data controller, to take the required action in accordance with the GDPR regarding the data breach
- To comply with the requirements of the Data Protection Policy of Scoil Bhríde N.S., Lisdowney available on our school website www.scoilbhridenslisdowney.weebly.com
- On termination of the contract between the data processor and the BoM of Scoil Bhríde N.S. Lisdowney all personal data held by the data processor must be returned to the Board as data controller or in the alternative, it must be entirely deleted from the data processor's systems and files

- To make available to the controller (BoM) all information necessary to demonstrate compliance with the obligations of the GDPR and to allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller
- If the processor believes that any instruction it receives from the controller is in breach of the GDPR, the processor shall immediately inform the controller

Third Party Data Processor signature _____

Date: _____

Signed on behalf of the BOM _____

Date: _____

(This agreement should be signed by the Data Processor and the BOM of the school and copies retained by both)

School email: lisdowneyns@gmail.com

Scoil Bhríde N.S., Lisdowney Data Protection Policy

Appendix 3 Data Privacy Notice to Parents

Scoil Bhríde N.S., Lisdowney

Privacy Notice to Parents / Guardians

By enrolling in and attending Scoil Bhríde N.S., Lisdowney you acknowledge that your personal data (including special category personal data) will be processed by Scoil Bhríde N.S.,Lisdowney . The purpose of this Privacy Notice is to better inform you of

- Who we are
- What personal data we collect about you and your child who is enrolled and attends our school
- How and why we use your personal data
- Who we share your personal data with
- The reasons why we share your personal data
- How long we keep your personal data
- Your rights as a Data Subject – the person about whom we collect and store personal data

If you need more information, please see our Data Protection Policy available at the school office or on our school website www.scoilbhridenslisdowney.weebly.com

Who we are:

- We are Scoil Bhríde N.S., Lisdowney
- Our address and contact details are Lisdowney, Ballyragget, Co. Kilkenny 056 8833495 and school mobile 086 1445629
- We provide primary education
- For further information, see our Data Protection Policy available at the office or on our website www.scoilbhridenslisdowney.weebly.com

The information we collect about you

The personal data we collect can include information about your identity and contact details; images/photo; family details; admission/enrolment details; previous schools; academic progress; PPS number; special educational needs; nationality; language; religion; medical data; information about behaviour and attendance; information about health, safety and welfare; financial information (re payments for books, tours etc); and other personal data. Further details of the data we collect about you can be found in our Data Protection Policy.

How and why we use your information and the legal basis

We use your personal data for purposes including:

- *your application for the enrolment of your child*
- *to provide your child with appropriate education and support*
- *to monitor your child's academic progress*

- *to care for your child's health and well-being*
- *to care for our staff and pupils*
- *to process grant applications and other funding*
- *to coordinate, evaluate, fund and organise educational programmes*
- *to comply with our legal obligations as an education body*
- *to comply with our monitoring and reporting obligations to Government bodies*
- *to process appeals, resolve disputes, and defend litigation etc.*

For further information on what data we collect, why we collect it, how we use it, and the legal basis for same, please go to our Data Protection Policy available at www.scoilbhridenslisdowney.weebly.com

Who we share your information with

We share your personal data with third parties, including other Government bodies.

This includes the Department of Education and Skills, NCSE, TUSLA, An Garda Síochána, HSE, the Department of Social Protection, the Revenue Commissioners etc.

The level of sharing and the nature of what is shared depend on various factors. The Government bodies to which we transfer your personal data will use your personal data for their own purposes (including: to verify other information they already hold about you, etc.) and they may aggregate it with other information they already hold about you and your family. We also share your personal data with other third parties including our insurance company and other service providers (IT providers, security providers, legal advisors etc.), We are legally required to provide certain records relating to the progress of a pupil (under 18 years) in his/her education to the pupil's parents/guardians, including results of assessments.

For further information on who we share your data with, when and in what circumstances, and why, please see our Data Protection Policy available at the school office or www.scoilbhridenslisdowney.weebly.com

How long we hold your child's data

- Some personal data is only kept for a short period e.g. data no longer needed will be safely destroyed at the end of an academic year
- Some data we retain for a longer period e.g. enrolment forms are retained in the school until your child reaches 25 years of age
- Some data is never destroyed e.g. Roll Books and School Registers

For further information on the retention periods, please go to our Data Protection Policy available at the office or on our website www.scoilbhridenslisdowney.weebly.com

You have the following statutory rights that can be exercised at any time

- Right to complain to supervisory authority
- Right of access
- Right to rectification
- Right to be forgotten
- Right to restrict processing

- Right to data portability
- Right to object and automated decision making/profiling

For further information, please see our Data Protection Policy available at the office or www.scoilbhrídenslisdowney.weebly.com

Scoil Bhríde N.S., Lisdowney Data Protection Policy

Appendix 4 Personal Data Access Request Form

Request for Personal Data under the Data Protection Acts 1988 to 2018 and EU GDPR

Important Proof of identity must accompany this Access Request Form (eg. Official photographic identity document such as driver's licence or passport)

Name: _____

Address: _____

Contact Number: _____

E mail address: _____

Please tick the box that applies to your request

Parent/Guardian of current pupil	<input type="checkbox"/>
Former pupil	<input type="checkbox"/>
Current staff member	<input type="checkbox"/>
Former staff member	<input type="checkbox"/>

Name of pupil		
Date of birth		
Year left school		
Years in school	From	To

I _____ wish to make an Access Request for a copy of personal data that Scoil Bhríde N.S. Lisdowney holds about me/my child. I am making this access request under Data protection Acts 2013 and 2018.

To help us locate your personal data please provide details such as dates, time, information sought which will assist us to meet your requirements.

Signature: _____ **Date:** _____