

# DATA PROTECTION POLICY

Reviewed and ratified by the Board of Management on June 24<sup>th</sup>, 2020

Signed: Denis Smith, Chairperson

Drawn up 2004, Reviewed and amended in Oct. 2009. Reviewed and amended in Oct. 2010. Reviewed and amended and ratified by Board in Mar. 2015. Amended and ratified by the Board in Dec. 2015. Reviewed, updated and ratified in October, 2018 and again in June 2020

# Data Protection Policy of Harold's Cross NS

## Rationale

**Purpose of the Policy:** In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the various Data Protections Acts which have been enacted in this country. 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 Data Protection Acts 1988, 2003, 2006 and 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.

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.

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.

The school operates a "Privacy by Design" method in relation to data protection. This means that we plan carefully when gathering personal data so that we build in the data protection principles as integral elements of all data operations. We audit the personal data in order to –

1. Be able to provide access to individuals to their data
2. Ensure it is held safely
3. Document our data procedures
4. enhance accountability and transparency

## Relationship to characteristic spirit of the school:

Harold's Cross NS is a Catholic school under the patronage of Catholic Archbishop of Dublin

Harold's Cross 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 and languages.

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

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school wishes to achieve these aims/missions while fully respecting individuals' rights to privacy and rights under the Data Protection Act.

### 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 and parents/guardians

**Data subject:** is an individual who is the subject of personal data

**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 form part of a relevant filing system.

**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. the school.

**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

**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.

**Data Controller:** For the purpose of this policy the Board of Management of Harold's Cross NS is the data controller.

**Data Processor:** any person who processes personal information on behalf of the Data Controller but does not include an employee of a data controller who processes such data in the course of their employment. For example, this might mean an organisation to which the data controller outsources work such as Databiz, or government agencies who process data for their purposes - in our case Esinet and the POD (Primary Online Data)

## **The Nine Principles of Data Protection**

As such, the school is obliged to comply with the eight principles of data protection set out in the Data Protection Acts 1988, 2003 and 2018 which can be summarised as follows:

### **1. The school must obtain and process *Personal Data* fairly:**

Information on pupils, parents and staff is gathered with the assistance of parents/guardians and staff. Information on a pupil may also be gathered from a child's previous school. This data may be added to during the course of a staff member's tenure in the school and while a pupil is enrolled on the school's register. All such data is treated in accordance with Data Protection Acts and the terms of this Data Protection Policy. The information will be obtained and processed fairly.

**2. Consent:** Information on pupils and staff is gathered with full and informed consent and the assistance of parents/guardians and staff. (See privacy and consent form)

### **3. The data is kept 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. (See below)

### **4. The school will process data 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. (See below)

### **5. The school will 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) are 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.

### **6. The school will 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.

## **7. 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.

## **8. 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.

## **9. 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. 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 one month. An extension may be required e.g. over holiday periods

No fee may be charged except in exceptional circumstances where the requests are repetitive or manifestly unfounded or excessive

No personal data can be supplied relating to another individual apart from the data subject.

### **PROVIDING INFORMATION OVER THE PHONE**

An 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:

- Ask that 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

### **Individuals have the following statutory rights that can be exercised at any time:**

- (a) Right to complain to supervisory authority.
- (b) Right of access.
- (c) Right to rectification.
- (d) Right to be forgotten.
- (e) Right to restrict processing.
- (f) Right to data portability.
- (g) Right to object and automated decision making/profiling.

**The following is an outline of the persons on whom data is retained in our school.**

**Personal Data** –any data relating to an identified or identifiable natural person who is or can be identified either from 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. the Board

**Data Subject:** is an individual who is the subject of personal data

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

### **A. Student records:**

**Categories of student data:** These **may** include:

Information which is sought and recorded at enrolment and may be collated and compiled during the course of the pupil's time in the school. These records may include:

#### **Registration/Enrolment**

- 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 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, medical issues etc.) which may apply
- Previous school attended if relevant

#### **● Test results:**

- **Categories:** The school will hold data comprising test results in respect of its students. These include class, mid-term, annual, continuous assessment, the outcomes of diagnostic assessments.
- **Purposes:** The main purpose for which these assessment 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 subject choices and levels. 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, to NEPS and other psychologists and such other similar bodies with the permission of the parents.
- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments/reports
- Individual Education Profiles
- Attendance records
- Photographs and recorded images of students.
- Academic records – subjects studied, class assignments, assessment results as recorded on official school reports and in assessment files
- Records of significant achievements

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- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Garda vetting outcome record
- Other records e.g. records of any serious injuries/accidents.
- Records of any reports the school may 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 to keep a record of the history of the school. Such records are taken and used in accordance with the school's "Acceptable Use Policy."
- to ensure that the student meets the school's admission criteria
- 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, HSE, NEPS 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 educational institutions (after enrolment).

**Location:** All manual student records are kept in secure, filing cabinets in the Principal's office 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.

Location:

Test results are kept electronically and are encrypted. Results are also kept manually in the Principal's office.

Student attendance records (previously in roll books) and PPS numbers are now maintained on the POD system (Primary Online System) and will be maintained in line with DES Guidelines. Access will be by permission of the Príomh Oide or (when absent) Deputy PO and to authorised personnel only.

### **Staff records:**

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(a) **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. Details of next of kin
- PPS number, Teaching Council Number, Teacher Number
- Original records of application, appointment to promotion posts and contracts.
- Details of approved absences (career breaks, parental leave, study leave etc.)
- Details of work record (qualifications, classes taught, subjects, attendance at relevant courses etc.)
- Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their school duties
- Medical certs
- 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 Safeguarding Procedures).
- Records pertaining to the induction and probation of NQTs under the Droichead process will be retained for a period of three years. An NQT who leaves the school will be given a copy of relevant records which the school holds in relation to the process.
- Bank account details

(b) **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
- compliance with legislation relevant to the school.
- To reimburse staff for any relevant approved expenses incurred by them.

**Location:** In a secure, 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.



**Security:** The records of staff members, current and former are kept in manual personal files. Records of absences are kept in digital format on the OLCS system. These files are retained in the Principal's Office. The Principal, secretary and Cathaoirleach only will have access to those files which contain information solely related to professional matters.

Digital files are retained on the School computer and are protected by password known only to the Príomh Oide, Leas Príomh Oide and secretary. These records will be retained in the school.

**Parents:**

- Name, address, email address, occupation, phone number, relationship status
- Contact details for emergency situations
- Permission from parents allowing a child to access SEN support
- Records of meetings pertaining to concerns about a child
- Referrals to relevant agencies such as TUSLA, HSE, NEPS
- Court decisions in relation to guardianship, custody or access

**Purpose:**

- To comply with legislative or administrative requirements
- to ensure that eligible students can benefit from the relevant additional teaching or financial supports
- to enable parents/guardians to be contacted in the case of emergency or in the case of school closure, to inform parents of school events etc.
- to inform parents of their child's educational progress
- to meet the educational, social, medical requirements of the child
- photographs and recorded images of parents are taken to celebrate school achievements, compile yearbooks, for the school website, record school events, and to keep a record of the history of the school. Such records are taken and used in accordance with the school's Acceptable Use Policy
- to ensure that the student meets the school's admission criteria
- to furnish documentation/ information to the Department of Education and Skills, the National Council for Special Education, TUSLA, HSE, NEPS and other schools etc. in compliance with law and directions issued by government departments

**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 boards)
- 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:** In a secure filing cabinet and on school computer system protected by passwords known to PO and Cathaoirleach of the BOM and only personnel who are authorised by Cathaoirleach or PO to use the data can access it.

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Employees and Board members are required to maintain the confidentiality of any data to which they have access.

#### **D. Other Records:**

Records relating to contacts such as patron bodies/insurance companies/legal advice/ buildings and lands etc will be securely maintained in the manner appropriate to its origins eg. paper correspondence or email as appropriate.

The school will hold other records relating to individuals. The format in which these records will be kept are manual record (personal file within a relevant filing system), and/or computer record (database).

#### **Categories of data:**

Creditors:

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.

**Purpose:** 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:** As with BoM records.

#### **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.

**Purpose:** 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 parent's 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:** 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.

**Security:** The PO, Cathaoirleach (As Data Controller) and Treasurer of BoM only will have access to these records as appropriate.

#### **CCTV images/recordings**

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**Categories:** CCTV is installed at the front door of the school, in the school yards, the astro and in the corridors in the new wings. This CCTV system 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 as detailed above. Recording equipment is located in the Principal's office.

**Security:** Access to images/recordings is restricted to the board as Data Controller, the Principal and the deputy P.O. 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. (See CCTV Policy)

#### **Links to other policies and to curriculum delivery**

To ensure that our school policies are 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.

The following policies may be among those considered:

- Child Safeguarding Policy
- Anti-Bullying Policy including Cyber Bullying.
- Code of Behaviour of the school
- Mobile Phone Policy
- Admissions/Enrolment Policy
- CCTV Policy
- Substance Use Policy
- ICT Acceptable Usage Policy
- SPHE/ RSE/Grow in Love etc.

#### **Processing in line with data subject's rights**

Data in this school will be processed in line with the data subjects' rights. Data subjects are the pupils, parents/guardians, employees and BoM members and all others whose records are covered by this policy.

Data subjects have a right to:

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

#### **Dealing with a data access requests**

Section 3 access request

Under Section 3 of the Data Protection Acts, an individual has the right to be informed whether the school holds data/information about them and to be given a description of the data together with details of the purposes for which their data is

being kept. The individual must make this request in writing and the data controller will accede to the request within 28 days.

The right under Section 3 must be distinguished from the much broader right contained in Section 4, where individuals are entitled to a copy of their data.

#### Section 4 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 (subject to some exemptions and prohibitions set down in Section 5 of the Data Protection Act)
- Request must be responded to within 40 days
- No fee will apply in Harold's Cross NS
- 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 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 will 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**

In Harold's Cross National school, any employee dealing with telephone enquiries will 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 to ensure that information is only given to a person who is entitled to that information
- Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified
- Refer the request to the Data Controller/PO for assistance in difficult situations. No employee should feel forced into disclosing personal information.

#### **Implementation arrangements, roles and responsibilities**

In Harold's Cross NS the Principal, on behalf of the BoM is 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 policy applies to the Board of Management, all school staff, parents/guardians, pupils and others including prospective or potential pupils and their parents/guardians, and to applicants for staff positions within the school insofar as measures relate to them.

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

Name	Responsibility
<b>Board of Management</b>	<b>Data Controller</b>
<b>Principal</b>	Ensuring the security of data, upskilling staff Implementation of Policy

**Teaching personnel:** Awareness of responsibilities. Carrying out all protocols to ensure that any material they have in respect of pupils is treated in a confidential manner and is maintained according to school protocols.

**School secretary:** Security, confidentiality, administration

**IT personnel:** Security, encryption, confidentiality

The policy also applies to all school staff, 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.

<b>Other Legal Obligations</b>
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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
- 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, Túsla 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

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- 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).

#### **Ratification & Communication**

This Data Protection Policy was most recently amended and ratified by the staff in May 2020 and ratified by the Board on June 24<sup>th</sup>, 2020. All concerned are made aware of any changes implied in recording information on students, staff and others in the school community.

**Informing Parents:** Parents/guardians are informed of the Data Protection Policy from the time of registration and or enrolment of their child. Parents are provided with a Privacy Notice and must consent to their child’s and their data being processed. The Data Protection Policy will form part of the Enrolment Pack, by either enclosing it or incorporating it as an appendix to the enrolment form.

#### **Monitoring the implementation of the policy**

The implementation of the policy shall be monitored by the PO and a sub-committee of the Board of Management consisting of a Parent/guardian and patron’s nominee.

#### **Reviewing and evaluating the policy**

**Review date:** Next review June 2023. Review may commence earlier in the light of new guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB), new legislation and feedback from parents/guardians, students, school staff and others

**Signed:** Denis Smith

**For and on behalf of BOM:** ...Denis Smith, Chairperson **Date:** 24.06.20

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