



**Coolmine
Community
School**

**DATA
PROTECTION
POLICY**

**Scoil
Phobail
Chúil Mhín**

**Dréacht-
Bheartas um
Chosaint Sonraí**

Clonsilla, Dublin 15.

Cluain Saileach, BAC 15.

DATA PROTECTION POLICY -

OUR MISSION STATEMENT

WE STRIVE TO CREATE AN
ATMOSPHERE OF MUTUAL
RESPECT WHICH PROMOTES
EXCELLENCE IN ALL ASPECTS
OF SCHOOL LIFE AND ALLOWS
INDIVIDUALS TO REALISE
THEIR FULL POTENTIAL.

DATA PROTECTION POLICY -

INTRODUCTION / RÉAMHRÁ

DATA PROTECTION POLICY OF COOLMINE COMMUNITY SCHOOL

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 and 2003 and the EU General Data Protection Regulation 2016/679.

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 General Data Protection Regulation 2016/679 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. 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. Personal data will be processed lawfully, fairly and in a transparent manner.

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- **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. Personal data will be collected for specific, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes. 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:** Data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against unlawful loss, destruction or damage, using appropriate technical or organisational measures. 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.

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- **Ensure that it is adequate, relevant and limited to what is necessary:** 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 the EU General Data Protection Regulation 2016/679 apply to the keeping and processing of all 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:

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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.

Data Subject is the living natural person to whom the personal data relates.

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. 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.

Data Controller for the purpose of this policy is the Board of Management, Coolmine Community School.

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 the EU General Data Protection Regulation 2016/679.

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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 has put in place safe practices which we believe 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.
- 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.

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- 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 (2017) 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).

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Our Mission

Coolmine Community School strives to create an atmosphere of mutual respect, which promotes excellence in all aspects of school life and allows individuals to realise their full potential.

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 fulfil its mission and realise its aims 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:

A. Staff records:

- (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, PPS number.
 - Original records of application and appointment to promotion posts.
 - Details of approved absences (career breaks, parental leave, study leave, medical certs 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).

This list is not exhaustive.

- (b) **Purposes:** Staff records are kept for the purposes of:

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- 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.

(c) **Location:** In a secure, locked filing cabinet that only personnel who are authorised to use the data can access and on computer record. Employees are required to maintain the confidentiality of any data to which they have access.

(d) **Security:** These records are kept on a manual record (personal file within a locked filing system) and computer record (database, with password protection and firewall protection) and in secure locked offices.

B. Student records:

(a) **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.

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- 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 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.
- Attendance records.
- Photographs and recorded images of students.
- Academic record – subjects studied, class assignments, examination results as recorded on official School reports.
- Records of significant achievements.
- Whether the student is repeating the Leaving Certificate.
- Whether the student is exempt from studying Irish.
- Records of disciplinary issues/investigations and/or sanctions imposed.
- Garda vetting outcome record (where the student is engaged in work experience organised with or through the School which requires that they be Garda vetted).
- Other records e.g. records of any serious injuries/accidents etc.
- 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).

This list is not exhaustive.

(b) **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 activities which promote student education such as the book rental scheme, extra-curricular activities, Debs committee etc.
- to support the provision of religious instruction.

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- 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.
 - to ensure that the student meets the School's admission criteria.
 - to ensure that students meet the minimum age requirements for their course.
 - 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 third-level educational institutions and/or prospective employers.
 - In respect of a work experience placement, (where that work experience role requires that the student be Garda vetted) the School will assist the student in obtaining their Garda vetting outcome (with the consent of the student and their parent/guardian) in order to furnish a copy of same (with the consent of the student and the student's parent/guardian) to the work experience employer.
- (e) **Location:** Personal data is kept in a secure, locked filing cabinet that only personnel who are authorised to use the data can access, on computer record, and in locked offices. Employees are required to maintain the confidentiality of any data to which they have access. Individual class data will be maintained by the class teacher.
- (f) **Security:** These records are kept on a manual record (personal file within a locked filing system), in locked offices and on computer record (database, with password protection and firewall protection).

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C. Board of Management records:

- (a) **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.
- (b) **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.
- (c) **Location:** In a secure, locked office that only personnel who are authorised to use the data can access and on computer record. Employees are required to maintain the confidentiality of any data to which they have access.
- (d) **Security:** These records are kept on a manual record and computer record (database, with password protection and firewall protection) and in a locked office.

D. Other records:

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). Some examples of the type of other records which the School will hold are set out below (this list is not exhaustive):

Those who provide a product or service to the School

- (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

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- PPS number
 - tax details
 - bank details and
 - amount paid.
- (b) **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.
- (c) **Location:** In a secure, locked filing cabinet that only personnel who are authorised to use the data can access, on computer record and in a locked office. Employees are required to maintain the confidentiality of any data to which they have access.
- (d) **Security:** These records are kept on a manual record (personal file within a locked *filing system*) and computer record (database, with password protection and firewall protection) and in a locked office.

CCTV images/recordings

- (a) **Categories:** CCTV is installed in the School, externally i.e. 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.
- (b) **Purposes:** Safety and security of staff, students and visitors, to safeguard School property and equipment and to assist in the day to day management of the school.
- (c) **Location:** Cameras are located externally and internally as detailed in the CCTV Policy. Recording equipment is located in two secure locations within the School.
- (d) **Security:** Access to images/recordings is restricted to the Senior Management team and a third party by request of a member of that team. 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

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Acts 1988 and 2003 and the EU General Data Protection Regulation 2016/679.

Examination results

- (a) **Categories:** The School will hold data comprising examination results in respect of its students. These results include class, mid-term, annual, continuous assessment and mock- examinations, CBA's and project work.
- (b) **Purposes:** The main purpose for which these examination 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 and such other similar bodies.

Location: In a secure, locked filing cabinet that only personnel who are authorised to use the data can access, on computer record and in locked offices. Employees are required to maintain the confidentiality of any data to which they have access.

- (c) **Security:** These records are kept on a manual record (personal file within a locked *filing system*) and computer record (database, with password protection and firewall protection) and in locked offices.

October Returns

- (a) **Categories:** At the beginning of each academic year (and for 1st year or transferring students, on enrolment) parents/guardians and students are asked to provide the school with certain information so that the School can make returns to the Department of Education and Skills ("DES") referred to as "October Returns". These October Returns will include sensitive personal data regarding personal circumstances which are provided by parents/guardians and students on the basis of explicit and informed consent. The October Return contains individualised data (such as an individual student's PPS number) which acts as an "identifier" for the DES to validate the data that belongs to a recognised student. The

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DES also transfers some of this data to other government departments and other State bodies to comply with legislation, such as transfers to the Department of Social Protection pursuant to the Social Welfare Acts, transfers to the State Examinations Commission, transfers to the Educational Research Centre, and transfers to the Central Statistics

Office pursuant to the Statistics Acts. The data will also be used by the DES for statistical, policy-making and research purposes. However the DES advises that it does not use individual data, but rather aggregated data is grouped together for these purposes. The DES has a data protection policy which can be viewed on its website (www.education.ie). The DES has also published a “Fair Processing Notice” to explain how the personal data of students and contained in October Returns is processed. This can also be found on www.education.ie (search for Circular Letter 0047/2010 in the “Circulars” section).

- (b) **Purposes:** The school asks parents/guardians and students to complete October Returns for the purposes of complying with DES requirements to determine staffing and resource allocations and to facilitate the orderly running of the school. The main purpose of the October Returns is for the DES to determine whether the student qualifies for English language support and/or additional resources and support to meet their particular educational needs. The October Returns are submitted to the DES electronically. The DES has their own policy governing the security of the data sent to them by all post-primary schools. The co-operation of each student and/or their parents/guardians in completing the October Return is greatly appreciated as the school’s aim is to ensure that each student is assisted in every way to ensure that s/he meets his/her full potential.
- (c) **Location:** In a secure, locked filing cabinet that only personnel who are authorised to use the data can access and on computer record. Employees are required to maintain the confidentiality of any data to which they have access.
- (d) **Security:** These records are kept on a manual record (personal file within a locked *filing system*) and computer record (database, with password protection and firewall protection) and in locked offices.

Applying the Data Protection Principles to Personal Data

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Lawful Processing of Personal data

The following grounds for lawful processing of personal data shall be followed:

- (a) The data subject has given consent to the processing.
- (b) The processing is necessary for the performance of a contract to which the data subject is a party.
- (c) The processing is necessary for compliance with a legal obligation to which the controller is subject.
- (d) The processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- (e) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- (f) The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

Processing in line with data subject rights

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

Data subject rights include:

- (a) The right to complain to a supervisory authority.
- (b) The right of access.
- (c) The right of rectification.
- (d) The right to be forgotten.
- (e) The right to restrict processing.
- (f) The right to data portability.
- (g) The right to object.
- (h) The right to compensation and liability.

Dealing with a data access requests

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Right of Access. You are entitled to see any information we hold about you. The school will, on receipt of a request from a data subject, confirm whether or not their personal data is being processed. In addition, a data subject can request a copy of their personal data in writing.

Such a request must be responded to within one month.

The data subject is also entitled to the following information:

- (a) The purposes of the processing.
- (b) The categories of personal data concerned.
- (c) The recipients or categories of recipient to whom the personal data have been or will be disclosed.
- (d) Where possible, the envisaged period for which the personal data will be stored.
- (e) The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing.
- (f) The right to lodge a complaint with a supervising authority.
- (g) Where the personal data are not collected from the data subject, any available information as to their source.
- (h) The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

If you are a student who is subject to estimated marks, and you make a data access request to the school for your estimated marks before the issue of results, the school will advise the following:

- that in line with section 56 of the Data Protection Act, it is not possible to respond to the request at present, and
- that the request will be taken to have been made on the later of either the date of the first publication of the results of the 'examination' (i.e. the Accredited Grades process), or the date of the request.

The School may disclose personal data if requested to do so by agencies such as the Gardai, TUSLA, the HSE, CAMHS, NEPS, the Department of Education and Skills, the Teaching Council, other civil authorities etc if the School is satisfied that the requester is entitled to the information and there is a sound legal basis for the School disclosing the information to them.

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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

In our School, 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 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 principal for assistance in difficult situations. No employee should feel forced into disclosing personal information.

Unapproved Systems

It is not appropriate to use an unapproved system for conducting/ discussing school business.

Data Breaches

A data breach occurs where there has been a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Data breaches may occur for a number of reasons, including:

- (a) Human error.
- (b) Sending a document to an incorrect recipient.
- (c) Loss of paperwork.
- (d) Theft of a briefcase or any device containing data.

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- (e) Inappropriate access controls allowing unauthorized staff use/ access.
- (f) Equipment/ software failure.
- (g) Inadequate system back-ups.
- (h) Damage caused by fire/ flood etc.
- (i) Malicious attacks such as hacking, viruses or deception etc.
- (j) This can occur through misappropriation; loss or theft of data or equipment.

The School is obliged to inform the Data Protection Commissioner of a data breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of individuals, without undue delay and, where feasible, not later than 72 hours after having become aware of such a breach.

The School will also notify data subjects, without delay, where the breach is likely to result in a high risk to the rights and freedoms of the data subject.

The School may need to notify other parties, such as the Gardai, the HSE, TUSLA, financial institutions, insurance companies etc, depending upon the nature of the breach.

The School will also document any data breaches, comprising the facts relating to the personal data breach and will store this information safely within the School.

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.

The following policies may be among those considered:

- Admissions Policy
- Alcohol and Substance Abuse Policy
- Anti-Bullying Policy
- Attendance and Participation Policy
- Child Protection Policy
- Code of Behaviour

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- Critical Incident Policy
- Exceptionally Able Policy
- Extra-curricular Activities Policy
- Intercultural and Inclusion Policy
- Internet Acceptable Usage Policy
- Mobile Phone Policy
- Protected Disclosure Policy
- Religious Education Policy
- RSE Policy
- Safety Statement
- School Guidance Policy
- School Tours Policy
- School Policy on Coursework
- Special Education Needs Policy
- SPHE Policy

Implementation arrangements, roles and responsibilities

In our School the Board of Management is the Data Controller and the Senior Management team 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
Board of management:	Data Controller
Senior Management Team:	Implementation of Policy
Teaching personnel:	Awareness of responsibilities
Administrative personnel:	Security, confidentiality
IT personnel:	Security, encryption, confidentiality

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Ratification & communication

When the Data Protection Policy has been ratified by the Board of Management, it becomes the School's agreed Data Protection Policy. The entire staff will have the opportunity to be familiar with the Data Protection Policy and the importance of putting into practice the specific implementation arrangements. All concerned will be made aware of any changes implied in recording information on students, staff and others in the School community.

Parents/guardians and students will be informed of the Data Protection Policy from the time of enrolment of the student.

Monitoring the implementation of the policy

The implementation of the policy shall be monitored by the Principal and a subcommittee of the Board of Management.

At least one annual report will be issued to the Board of Management to confirm that the actions/measures set down under the policy are being implemented.

Reviewing and evaluating the policy

The policy will be reviewed and evaluated as necessary. On-going review and evaluation will 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 will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

Adopted and ratified by Board of Management on 01/05/2018

Amended and ratified by the Board of Management on 1/04/2021



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