

St.Attractas's Junior National School (19537B)

DATA PROTECTION POLICY

RELATIONSHIP TO CHARACTERISTIC SPIRIT OF THE SCHOOL:

St. Attracta's JNS seeks to:

- enable students 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 Data Protection legislation.

INTRODUCTORY STATEMENT AND RATIONALE

In addition to its legal obligations under the broad remit of educational legislation, St. Attracta's JNS has a legal responsibility to comply with the Data Protection Acts 1988 to 2018 and the GDPR.

The Board of Management (BoM) of St. Attracta's JNS collects and retains data relating to its past, present and future staff, students, parents/guardians and other members of the school community. The BoM therefore is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 to 2018 and the EU General Data Protection Regulation (GDPR).

The Data Protection legislation applies to the keeping and processing of *Personal Data*. 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.

SCOPE

The school's Data Protection Policy applies to the **personal data** held by the school's Board of Management (BoM), which is protected by the Data Protection Acts 1988 to 2018 and the EU General Data Protection Regulation (GDPR).

This policy explains what sort of data are collected, why they are collected, for how long they will be stored and with whom they may be shared. It is 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 takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data.

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 special categories of personal data will be protected by the school.

DEFINITION OF DATA PROTECTION TERMS

There are some key terms used in this document which have precise meanings in this context. In the interests of clarity these key terms are defined below:

Personal Data means any data relating to an identified or identifiable 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 (BoM).

Data Controller

The *data controller* is the individual or organisation that determines the **purposes** for which and the **means** by which personal data is processed. The term *data controller*, when used in this policy document, refers to the Board of Management of the school.

Data Subject - is an individual whose personal data are collected and/or retained by the data controller. The data subjects referred to in this policy will typically be the school staff, the Board of Management, parents/guardians, students and certain others including prospective or potential students and their parents/guardians, applicants for staff positions within the school and other individuals with whom the school has a working relationship **as described below**.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data
- Retrieving, consulting or using the data
- Disclosing the data by transmitting, disseminating or otherwise making it available
- Aligning, combining, blocking, erasing or destroying the data

Data Processor - a person, other than an employee of a data controller, who processes personal information on behalf of the data controller. In the context of this policy the term will mean an employee of an organisation to which the BoM out-sources work. Where a Data Processor is used by the school an appropriate *Written Third party service agreement* (see below) will be in place.

Special categories of Personal Data refers to *Personal Data* regarding a person's:

- racial or ethnic origin
- political opinions or religious or philosophical beliefs
- physical or mental health
- sexual life and sexual orientation
- genetic and biometric data
- criminal convictions or the alleged commission of an offence
- trade union membership

Personal Data Breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. This means any compromise or loss of personal data, no matter how or where it occurs.

DATA PROTECTION PRINCIPLES

St. Attracta's JNS operates a "**Privacy by Design**" method in relation to Data Protection. This means we plan carefully when gathering personal data so that we build in the following **data protection principles** as integral elements of all data operations in advance.

1. 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 **are** treated in accordance with the Data Protection legislation and the terms of this Data Protection Policy. **All** information **is** obtained and processed fairly.

2. Consent

Where consent is the basis for provision of personal data the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes. When any data are requested St. Attracta's JNS will provide an explanation of why the data are being sought and will require a clear, affirmative appropriate action e.g. ticking of a box and/or signing a document to indicate consent. Consent can be refused or withdrawn at any time.

3. Keep it only for one or more specified and explicit lawful purposes

The BoM will inform individuals of the reasons they collect their data and 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.

4. 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.

5. Keep Personal Data safe and secure

Only those with a genuine reason for doing so may gain access to the information. Personal Data is securely stored under lock and key in the case of manual records and protected with computer software and password protection in the case of electronically stored data. Sensitive data is not stored on portable devices. Portable devices storing personal data (such as laptops) are encrypted and password-protected.

6. 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. Records must not be altered or destroyed without proper authorization. If alteration/correction is required, then a note of the fact of such authorization 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 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. See [School Record Retention](#) table - **Appendix 1**

9. Provide a copy of their personal data to any individual on request

Individuals have a right to know and have access to a copy of personal data held about them, by whom, and the purpose for which it is held. The procedure for gaining access to such data is described fully in Appendix 2.

We audit the personal data we hold in order to be able to:

1. provide individuals with access to their personal data
2. ensure that all data are held securely
3. document our data protection procedures
4. enhance accountability and transparency

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 [Children First Act 2015](#), mandated persons in schools have responsibilities to report child welfare concerns to TUSLA-Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

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 (**DES**), Tusla, the National Council for Special Education, HSE, and other schools). The BoM must be 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; 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) 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 most schools are not currently subject to freedom of information legislation, (with the exception of schools under the direction of Education and Training Boards), 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 by that body if a request is made to that body.

For the purpose of the [School Health Programme](#) certain pupil data may be shared with the [HSE](#). The school has a legal obligation to provide the data to the HSE within 10 days of a request from them. The legal basis for this is:

- GDPR Article 6:
 - processing is necessary for compliance with a legal obligation to which the controller is subject;
- GDPR Article 9:
 - processing is necessary for the purposes of preventive medicine, medical diagnosis, the provision of health treatment or the management of health systems and services on the basis of law; and
 - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health on the basis of law.
- Infectious Diseases (Amendment) (No. 2) Regulations 2024;
- Health (Provision of Information for Health Examination and Treatment Service) Regulations 2024.

Under the regulations, the school must provide the following information:

- the name, address, date of birth and sex of the pupil
- the mother's birth surname
- contact details (including the name, phone number and email address of their parent/guardian)
- the pupil's PPSN (if any)
- the name of the school which the pupil attends and the school roll number

Reports/Files on pupils who are transferring to another school will only be passed on by St. Ann's JNS after express written permission has been sought and received from the parents of the said pupils. These include reports/files completed by external professionals e.g. Educational Psychologists, as well as those completed by the staff of St. Ann's JNS.

PERSONAL DATA

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

1. 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.
- Teaching Council and Teacher number
- Name and contact details of next-of-kin in case of emergency.
- Original records of application and appointment to promotion posts
- Details of approved absences (career breaks, parental leave, study leave, etc.)
- Continuous Professional Development certificates
- Copies of medical certificates for certified absences
- 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 Garda Vetting and Statutory Declaration forms
- 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 Children First Act 2015.

b) *Purposes:*

Staff records are kept in order to facilitate:

- the management and administration of school business (now and in the future)
- 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)
- pension payments in the future
- human resources management
- recording of promotions made (documentation relating to promotions applied for) and changes in responsibilities, etc.
- enabling 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)
- enabling 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.

c) *Location and Security procedures of St. Attracta's JNS:*

- a. Manual records are kept in a secure, locked filing cabinets only accessible to personnel who are authorised to use the data. Employees are required to maintain the confidentiality of any data to which they have access.
- b. Digital records are stored on password-protected computer with adequate encryption and firewall software in a locked office.
- c. The school management team and the school caretaker are the sole key holders to the office. The school has the burglar alarm activated during out-of-school hours.

2. Student records:

a) *Categories of student data:*

These may include:

- Information sought and recorded at enrolment which may be added to, 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, postal addresses, email addresses of parents/guardians and their telephone contact details (including any special arrangements with regard to guardianship, custody or access)
- religious belief and baptismal certificate (may be applicable to students enrolled pre-2019)
- 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 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
- Student Support Plans
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements). [These are managed in line with the relevant Acceptable Users Policy and with the express consent of parents/guardians]
- Academic record –standardised test results as recorded on official School reports
- Records of significant achievements
- 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.
- Records of disciplinary issues/investigations and/or sanctions imposed
- Records of any reports the school (or its employees) have made in respect of the student to State Departments and/or other agencies under Children First Act 2015.

b) Purposes: The purposes for keeping student records include:

- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirement for attendance at Primary School.
- to comply with legislative or administrative requirements
- to enable each student to develop to his/her full potential
- 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
- 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 educational institutions.

c) (Location and Security procedures as above):

3. Board of Management records:

a) Categories of Board of Management data:

- 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
- Records in relation to the Garda Vetting
- Minutes of Board of Management meetings and correspondence to the Board which may include references to 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 and Security procedures as above):

4. Other Records: Creditors

a) Categories of Board of Management 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

b) Purposes: The purposes for keeping creditor records are:

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 and Security procedures as above):

5. Charity Tax-back Forms

a) Categories of Board of Management 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.

b) Purposes: The purposes for keeping creditor records are:

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 event of audit by the Revenue Commissioners.

c) (Location and Security procedures as above):

6. Other Records:

The school may hold data in relation to some persons undertaking relevant work or activities in the school (such as a sports coach, educational workshop providers, guest speaker, individuals on work experience placements, parental volunteers including members of the school Parents Association). In the case of these individuals the following data may be held by the school:

- Name
- Address
- Telephone number
- E mail address

- Garda Vetting Records

- *Purposes:*

To satisfy Garda Vetting requirements as per DES Circular 30/2016.
To facilitate contact with these individuals as relevant

- *(Location and Security procedures as above):*

STANDARDISED TEST RESULTS/DIAGNOSTIC TESTING

The school will hold data comprising Standardised results in respect of all its students and diagnostic testing in relation to children in receipt of Special Education Teaching.

Purposes:

The main purpose for which these examination results are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardian about educational attainment levels and recommendations for the future. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. Standardised Test data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment, National Council for Special Education, National Education Psychological Service and other schools to which pupils transfer.

Location and Security procedures

As above

Primary School DES Returns:

At the beginning of each academic year parents/guardians are asked to provide the school with certain information so that the school can make Returns to the DES. These Returns include sensitive personal data regarding the pupils of the school on the basis of the informed consent of parents/guardians being sought and received. Returns which submitted on the Pupil Online Database (POD), contain individualised data (such as the child's PPS number which acts as an identifier for the DES to validate the data that belongs to a recognised student. The DES also transfers some of these data to other government departments and State bodies to comply with legislations, such as transfers to the Department of Social Protection pursuant to the Social Welfare Acts, transfers to the Education 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 data protection policy 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 contained on POD is processed <https://www.education.ie/en/Publications/Statistics/Primary-Online-Database-POD-/POD-Fair-Processing-Notice.pdf>

Purposes:

The rationale for seeking and retaining personal data pertinent to POD is as follows:

- To comply with DES requirements to determine staffing and Special Education Teaching allocations
- To determine resource allocations to schools
- To facilitate the orderly running of schools

Location and Security procedures

Personal data pertaining to POD is kept on school computer files in the school office. These files are password protected and employees are required to maintain confidentiality in relation to the data to which they have access.

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:

- Pupil Online Database (POD): Collection of the data for the purposes of complying with the Department of Education and Skills' pupil online database.

- Child Protection Procedures
- Anti-Bullying Procedures
- Code of Behavior
- Enrolment Policy
- ICT Acceptable Usage Policy
- Assessment Policy
- Special Educational Needs Policy
- Library Policy
- Book-Rental Policy
- Critical Incident Policy
- Attendance Policy
- Special Education Teaching Policy

• **CCTV IMAGES/RECORDINGS-**

- CCTV is installed in St. Attracta's JNS.
- Cameras are installed externally facing the three main access doors to the school, and internally facing the main entrance.
- These CCTV systems may record images of staff, students and members of the public who visit the premises.
- The viewing station is in the room internally known as the "Equipment Room" in the yellow corridor.

Purposes:

- Safety and security of staff, students and visitors and to safeguard school property and equipment.
- Students and staff (teaching and non-teaching) will *not* be monitored for performance or conduct purposes.

Security:

- Access to images/recordings is restricted to the Principal and Deputy Principal and Secretary of the school. 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 Data Protection Acts legislation.
- Signage is installed indicating the presence of CCTV on the premises

PROCESSING IN LINE WITH A DATA SUBJECT'S RIGHTS

Data in this school will be processed in line with the data subject's rights. Data subjects have a right to:

- Know what personal data the school is keeping on them
- 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
- Ask to have data erased once it is no longer necessary or irrelevant.

Data Processors

Where the school outsources to a data processor off-site, it is required by law to have a written contract in place (*Written Third party service agreement*). St. Attracta's JNS 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. In addition the Data Protection legislation places responsibilities on these entities in relation to their processing of any personal data provided to them.

The Data Processors currently used by the school are:

Aladdin- School Administrative System
 POD- Primary Online Database for the Department of Education (DES)
 Meehan & Associates, Accountants and Tax Advisers
 Datapower Ltd. T/A Merion Security

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 natural persons, the BoM must communicate the personal data breach to the data subject without undue delay.
- If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (BoM) 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 **will** normally be responded to within one month. An extension may sometimes be required e.g. over holiday periods
- No fee will 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. Personal data relating to other individuals will be redacted where necessary.

PROVIDING INFORMATION OVER THE PHONE

School personnel will not disclose any personal data held by the school over the phone. Instead they will

- Ask that the caller put their request in writing
- Refer the request to the Principal for assistance in difficult situations
- The BoM will not countenance any attempt to force/persuade/coerce personnel into disclosing personal data

IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES

The BoM is the data controller and the Principal implements the Data Protection Policy, 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
Principal:	Implementation of Policy

RATIFICATION & COMMUNICATION

Ratified at the BoM meeting on _____ and signed by Chairperson.

MONITORING THE IMPLEMENTATION OF THE POLICY

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

REVIEWING AND EVALUATING THE POLICY

The policy will be reviewed and evaluated after 2 years. 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 TUSLA), 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

Signed: John Mc Donnell,

Chairperson (*For and behalf of Board of Management*)

Date Ratified: 3rd December 2024

Appendix 1

St. Attracta's JNS, Meadowbrook, Dundrum, Dublin 16

Roll No. 19537B

DATA RETENTION PERIODS FOR SCHOOLS

<i>Pupil Related</i>	<i>Retention Periods</i>
School Register/Roll Books Enrolment Forms Disciplinary notes Test Results – Standardised Psychological Assessments etc. SEN Files/IEPS Accident Reports Child Protection Reports/Records S.29 Appeals	Indefinitely Hold until Pupil is 25 Years Never Destroy Hold until pupil is 25 Years Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy
<i>Interview Records</i>	
Interview Board Marking Scheme Board of Management notes (for unsuccessful candidates)	18 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is being taken.
<i>Staff Records</i>	
Contract of Employment Teaching Council Registration Vetting Records	Retention for duration of employment + 7 years Retention for duration of employment + 7 years Retention for duration of employment + 7 years

Accident/Injury at work Reports	(6 years to make a claim against the school plus 1 year for proceedings to be served on school)
<i>BoM Records</i>	
BOM Agenda and Minutes CC TV Recordings	Indefinitely 28 days normally. In the event of criminal investigation – as long as is necessary
Payroll & Taxation	Revenue require a 6-year period after the end of the tax year
Invoices/receipts	Retain for 7 Years
Audited Accounts	Indefinitely
<i>Other Records-As per Section 6</i> Garda Vetting Disclosures	As per provisions of DES Circular 31/2016
<p><i>Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?</i></p> <p><i>The reasoning is that a pupil reaches the age of majority at 18 years and that there should be a 6-year limitation period in which it would be possible to take a claim against a school, plus 1 year for proceedings to be served on a school. The Statute of Limitations imposes a limit on a right of action so that after a prescribed period any action can be time barred.</i></p>	

Appendix 2

Personal Data Access Request Form

St. Attracta's JNS

Roll No.19537B

Request for a copy of Personal Data under the Data Protection Acts 1988 to 2018

Important: This Access Request Form must be accompanied with a photographic proof of Identity (eg. official/State photographic identity document such as driver's licence, passport, and public services card. Where the name of an individual submitting an Access Request for their own data is different to that on the school records legal proof of the fact that the applicant is the individual named is required.

Full Name:	
Name currently on school records:	
Address:	
Contact number *	Email addresses *

--	--

* We may need to contact you to discuss your access request

Please tick the box which applies to you:

Parent/ Guardian of current Pupil or of former pupil who is still a legal minor* <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 of Pupil:	
Insert Year of leaving:		Insert Years From/To:	

(*THEY ONLY SPEND 4 YEARS WITH JNS BUT WILL BE MINORS FOR 10 YEARS OR SO THEREAFTER)

DATA ACCESS REQUEST:

I, wish to make an Access Request for a copy of personal data that *St Attracta's Junior NS.*, holds about me/my child. I am making this access request under Data Protection Acts 2013 to 2018

To help us to locate your personal data, please provide details below, which will assist us to meet your requirements e.g. description of the category of data you seek

Any other information relevant to your access request (e.g. if requesting images/recordings made by CCTV, please state the date, time and location of the images/recordings as otherwise it may be very difficult or impossible for the school/ETB to locate the data)

I declare that all the details I have given in this form are true and complete to the best of my knowledge.

Signature of Applicant Date:

Please return this form to the relevant address:

To the Chairperson of Board of Management *St. Attracta's Junior NS*

St. Attracta's JNS,

Meadowbrook,

Dundrum,

Dublin 16.

SCHOOL WEBSITE PRIVACY STATEMENT

ST. ATTRACTA'S JNS PRIVACY STATEMENT

Website of St.Attracta's JNS:

St Attracta's JNS is committed to preserving the privacy of all visitors to **www.stattractasjns.ie** ("our website"). This privacy statement relates to our practices in connection with our website and is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us and to assist you in making informed decisions when using our site and our services. **St Attracta's JNS** fully respects your right to privacy. We will not collect personal information/personal data about you when you visit our website unless you choose to provide that information using the "**Contact us**" form.

By using this site, you consent to the collection and use of your information under the terms of this privacy statement which is in accordance with the Data Protection Acts 1988 to 2018, the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 and the EU General Data Protection Regulation (GDPR). Please read the following privacy statement to understand how we use and protect the information that you choose to provide to us.

WHAT INFORMATION DO WE COLLECT?

When you visit our website you may provide us with two types of information:

- Personal information you knowingly choose to disclose that is collected on an individual basis, and
- Statistical web site use information collected on an aggregate basis as you and others browse through our website(s)

INFORMATION, PERSONAL AND NON-PERSONAL, YOU CHOOSE TO PROVIDE

Email address

When you visit our website you may wish to provide certain information about yourself, such as when you complete our "**Contact Us**" form. **St Attracta's JNS** does not collect any personal data about you on this website, apart from the information which you volunteer to send us in the "**Contact Us**" form

Web Site Use Information

Where you visit our website, certain non-personal data is available to us through our internet service provider. This non-personal data is collected on a statistical, aggregate, non-individual basis. This information may include the IP address from which you access our website, the type of internet browser used to access our website, the type of operating system used to access our website, the "top-level" domain name used (ie, .com, .org, etc.), the date and time of your visit to our website and the number of pages you visited on our website

How Do We Use the Information That You Provide to Us?

Any information, which you provide using the "**Contact Us**" form, is not made available to any third parties and is only used by **St Attracta's JNS** in line with the purposes for which you provided it (e.g. to contact you and answer any queries which you have raised in the "**Contact Us**" form or to address any other feedback which you send us in the "**Contact Us**" form)

Disclosure to Other People:

We do not disclose, sell or distribute any personal information which you send to us to any third parties. We may pass aggregate information on the usage of our site to third parties, but this will not include information that can be used to identify you. Your personal data may also be

anonymised and used for statistical purposes. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

IP Addresses:

An IP address is a number that is assigned to your computer automatically when you use the internet. When you visit any web page in our website, our servers log your IP address. We may use your IP address to help diagnose problems with our server and to administer our website. Your IP address is also used to help identify you and to gather broad demographic information.

SECURITY

We employ security measures to protect your information from access by unauthorised persons and to guard against unlawful processing, accidental loss, destruction and damage and we will do our best to ensure that all records we hold remain secure in line with our obligations under Data Protection Acts 1988 to 2018. We take our security responsibilities seriously, employing appropriate physical and technical measures. We review our security procedures regularly

RETENTION

We do not retain your personal data for longer than it is necessary for us to comply with the purpose for which you gave it to us. Any personal data which you provide to us using this website will be used in line with the purposes for which you provided it (e.g. to contact you and answer any queries which you have raised in the "**Contact Us**" form or to address any other feedback which you send us in the "**Contact Us**" form) and after this purpose has been completed, we will delete your personal data.

ACCESSING YOUR INFORMATION

You are entitled to see the information we hold about you. On written request, we supply copies of your personal data, which you may have supplied to us using our website. If you wish to obtain copies of this personal data, you should write to the Board of Management of **St Attracta's JNS** at **Meadowbrook, Dundrum, Dublin 16** and ask that it provides you with an Access Request Form. Your request will be dealt with as soon as possible and will not normally take more than a month to process. If you discover that **St Attracta's JNS** holds inaccurate information about you, you can request that we correct/delete that information.

WEBSITES LINKED TO OUR WEBSITE

Our website may, from time to time, contain links to and from third party websites. We are not responsible for the practices employed by websites linked to or from our website nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our website

Please remember that when you use a link to go from our website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites which have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding

By using our website you consent to our collection and use of your personal information as described in this Privacy Policy. If we change our privacy policies and procedures, we will post those changes on our website to keep you abreast of any developments.

Contacting Us

If you are concerned about how your personal data are processed by our website, please bring your concerns to our attention using the contact details below:

**The Board of Management,
St Attracta's JNS,
Meadowbrook, Dundrum, Dublin 16**

or by email to **stattractasjns@gmail.com**