

Data Protection/Record Retention Policy

Introduction and Rationale

This policy was formulated by the staff and Board of Management of Scoil an Linbh Íosa and applies to all staff and pupils as well as other partners with whom the school has business.

The school recognises and accepts its responsibility as set out in the following:

- Data Protection Act 1998 and Data Protection (Amendment) Act 2003.
- Education Act 1998, section 9 (g), requiring a school to provide access to records to parents and to past pupils over 18.
- Education Act 1998, section 22.2 (b), requiring a school to regularly evaluate students and periodically report the results of the evaluation to the students and their parents.
- Education Welfare Act 2000, requiring a school to report school attendance and transfer of pupils.

Scoil an Linbh Íosa (the school) as Data Controller will take all reasonable steps to meet this responsibility and to promote good practice in the handling and use of personal information.

In particular, the school will comply with the Data Protection Principles as set out in the Data Protection Acts. These principles state that data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Used and disclosed only in ways compatible with these purposes
- Adequate, relevant and not excessive.
- Accurate and, where necessary, kept up to date.
- Kept no longer than necessary.
- Processed in accordance with data subjects rights.
- Kept in a safe and secure

The data controller must give a copy of his/her personal data to an individual on request

Relationship to the characteristic spirit of the school

Scoil an Linbh Íosa respects the rights of privacy of all those in the whole school community.

Aims of the Policy

- To ensure that the school complies with its legislative obligation.
- To protect the rights and privacy of all those who are the subjects of data that comes into the possession of the school. (Personal. Pupil, Administrative, Board of Management)
- To clarify the types of records maintained and the procedures relating to making them available to the relevant bodies, including parents and pupils over 18.

Overview of Policy

The Principal assumes the function of Data Controller and supervises the application of the Data Protection Act within the school.

The data under the control of the Principal comes under the following headings:

1. Sensitive Personal Data

- Religious Belief
- Staff medical certificates and correspondence from Medmark group.
- Pupil medical certificate
- Data relating to child protection

2. Personal Data

- **Enrolment Data**

This data relates to personal details of the students such as name, address, date of birth, gender, dietary information, PPSN.

- **Staff data**

This includes names, addresses, PPSN, contact details, payroll number, CVs, attendance records and copies of employment contracts.

- **Parent/Guardian Data**

This includes details listed on a pupil's enrolment form and payments made to the school.

- **Other**

This includes CVs on file, submitted by persons applying for work experience/substitute work.

3. Pupil Records

- Results of teacher designed tests,
- Standardised tests results,
- Copy of IEP (Individual Education Plan for pupils with Special education Needs),
- Behaviour plan and classroom support plans (where necessary)
- Confidential reports
- Correspondence from parents
- Copy of court orders re access
- Copy of end of year report
- Approval of resources from NCSE
- Records of breaches of serious or gross misbehaviour
- Records of meetings between Principal and parents
- Parent/teacher meeting record card
- Results of standardised tests
- Administration of medicine indemnity form
- Letters of transfer
- Exemption from studying Irish
- Copies of correspondence that have been sent to external agencies.

4. Administrative Data

- Incident Report Book
- Yard book (record of incidents on the yard)
- Roll books and registers
- Sign in books for staff
- Sign out book for pupils

5. Board of Management

- The minute book of The Board of Management records the decisions reached by the Board in the discharge of its statutory duty. The minute book also includes (i) correspondence of a non routine nature received and discussed by The Board, (ii) copies of the Financial reports presented to the Board, (iii) copies of the Principal's reports presented to the Board and (iv) any other documentation that the Board, in its absolute discretion, deems appropriate to be included in the minute book.

- Complaints presented to the Board and all subsequent correspondence
- Payroll data
- Financial data

Disclosure of records

Elements of the data listed above may be disclosed, where relevant and appropriate, with the consent of the data controller to the following :

- Parents/guardians, past pupils over 18.
- School staff
- Outside agencies such as the DES, HSE (these include the NCSE, Beech Park Services, Child Guidance Services)
- Other schools to which pupils are transferring.

Parental authorisation will be sought in advance of release of data to outside agencies.

Outside agencies requesting disclosure of data must do so in writing.

Parents/Guardians must also make such a request in writing to the Data Controller.

Responding to Requests

The data controller will respond to requests within 40 days of receipt of same.

Guidelines on Retention time for Data

All data will be retained for the duration of a pupil's enrolment / staff employment and for an additional period of between 1 and 8 years. In certain circumstances some data may be retained indefinitely.

Personal Data and Pupil records

The following will be kept for 8 years after the pupil leaves the school:

- Parent/teacher meeting record cards
- End of year report from each year in school
- Standardised test results from each year in school
- Copy of most recent professional reports from outside agencies
- Copies of Individual Education Plans

- Records held by the principal in relation to child protection/child welfare will be held indefinitely

Retention time for Administrative Data

- Yard book, Incident Report Book and record sheets of fire drills will be kept for 8 years
- Staff records will be retained for 1 year following their departure and then will be shredded
- Records in relation to staff welfare will be held for 8 years
- Records for employees of the Board of Management will be retained for 8 years
- Applications/CVS submitted for work experience will be shredded at end of current year
- Financial records (office) will be kept for 1 year
- Sign in book for staff/sign out book for pupils will be shredded at the beginning of the following year
- Roll books will be kept forever

Retention time for Board of Management Data

- The minute book of the Board of Management meetings will be held indefinitely.

Storage

Data that is to be stored for 8 eight years will be stored in a secure location and will be accessible by designated personnel only.

Data stored on computers is password and firewall protected. Passwords are changed regularly.

Implementation Date

This new policy is effective from January 2011 following ratification by the Board of Management.

All data that is designated for long term storage will be transferred to a secure location. Thereafter, at the commencement of each new school year, data that is in excess of 8 years, will be destroyed and the relevant long term storage data from the previous school year will be placed in storage.

Ratification Date: December 20th 2010

