



# TYRRELSTOWN

Educate Together National School

## Data Protection Policy

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<sup>1</sup> A policy is that which has been approved directly by the Board of Management.

<sup>2</sup> A procedure is that which approval of has been delegated to the Principal and staff by the Board of Management.

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# 1. Introductory Statement

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)

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.

Tyrrelstown Educate Together NS 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 **data protection principles** as integral elements of all data operations in advance. We audit the personal data we hold in order to

1. be able to provide access to individuals to their data
2. ensure it is held securely
3. document our data protection procedures
4. enhance accountability and transparency

## 2. Data Protection Principles

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

### 2.1 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 is treated in accordance with the Data Protection legislation and the terms of this Data Protection Policy. The information will be obtained and processed fairly



## **2.2 Consent**

Where consent is the basis for provision of personal data, (e.g. data required to join sports team/ after-school activity or any other optional school activity) the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes. Tyrrelstown Educate Together NS will require a clear, affirmative action e.g. ticking of a box/signing a document to indicate consent. Consent can be withdrawn by data subjects in these situations

## **2.3 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

## **2.4 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

## **2.5 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. Portable devices storing personal data (such as laptops) are encrypted and password-protected. Staff are issued with a unique usernames and passwords to access staff computers, G Suite for Education and the Aladdin website.

## **2.6 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 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



## 2.7 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

## 2.8 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.

## 2.9 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

## 3. Scope

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

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

### 3.2 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:

*Personal Data* means any data relating to an identified or identifiable natural person i.e. 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 (BoM)

*Data Controller* is the Board of Management of the school

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

*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 who processes personal information on behalf of a 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 employee of an organisation to which the data controller out-sources work. The Data Protection legislation places responsibilities on such entities in relation to their processing of the data. Data processors which Tyrrelstown Educate Together National School use are Aladdin; G Suite for Education, School accounting/wages processors.

*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

## 4. 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 to 2018 and the GDPR

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

## 5. 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. Tyrrelstown Educate Together NS sends, by post, a copy of a child's Passport, as provided by the National Council for Curriculum and Assessment, to the Principal of the Post-Primary School in which the pupil has been enrolled

Where reports on pupils which have been completed by professionals, apart from Tyrrelstown Educate Together NS staff, are included in current pupil files, such reports are only passed to the Post-Primary school following express written permission having been sought and received from the parents of the said pupils

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, Tusla, the National Council for Special Education 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 2014](#) 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

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 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)

## 6. Relationship To Characteristic Spirit Of The School:

Tyrrelstown Educate Together NS 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 the Data Protection legislation.

## 7. Personal Data

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

### 7.1 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.
- 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.)
- 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 Children First Act 2015

*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
- and for compliance with legislation relevant to the school.

*c) Location and Security procedures of Tyrrelstown Educate Together NS:*

- a. Manual records are kept in a secure, locked filing cabinet in a locked administration office 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. The school has the burglar alarm activated during out-of-school hours.

## 7.2 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
  - 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 (including at school events and noting achievements) are managed in line with the accompanying policy on school photography.
- Academic record – subjects studied, class assignments, examination 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. (Note: it is advisable to inform parents that a particular incident is being recorded).
- Records of any reports the school (or its employees) have made in respect of the student to State Departments and/or other agencies under Children First Act 2015.

*b) Purposes:*

The purposes for keeping student records include:

- to enable each student to develop to his/her 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, e.g. 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 requirement for attendance at Primary School.
- to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- to furnish documentation/information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other schools, etc. in compliance with law and directions issued by government departments
- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.

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

## 7.3 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
- 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):*

## 7.4 Other Records

### 7.4.1 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):*

## 7.4.2 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.

## 8. CCTV Images/Recordings

CCTV is installed Tyrrelstown Educate Together NS

---- cameras are installed externally e.g. perimeter walls/fencing on each side of the school building.

---- cameras are installed internally; e.g. In the foyer covering the main entrance to the school

These CCTV systems may record images of staff, students and members of the public who visit the premises.

The viewing station is in the main school administration office

*Purposes:*

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

*Security:*

Access to images/recordings is restricted to the Principal and Deputy Principal 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.

## 9. Examination Results

The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual and continuous assessment results and the results of Standardised Tests

*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. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and other schools to which pupils move.

## 10. 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 Behaviour
- Enrolment Policy
- ICT Acceptable Usage Policy

- Assessment Policy
- Special Educational Needs Policy
- Library Policy
- Book-Rental Policy
- Critical Incident Policy
- Student Council Policy
- Attendance Policy

## 11. 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.

### 11.1 Data Processors

Where the school outsources to a data processor off-site, it is required by law to have a **Written Third party service agreement**. Tyrrelstown Educate Together NS 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.

### 11.2 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.

## 11.3 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

## 12. 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

## 13. 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:

<b>Name</b>	<b>Responsibility</b>
Board of Management:	Data Controller
Principal: Tim Stapleton	Implementation of Policy

## 14. Ratification & Communication

Ratified at the BoM meeting on 21/05/2020 and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting

## **15. Monitoring The Implementation of the Policy**

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

## **16. Reviewing and Evaluating the Policy**

The policy will be reviewed and evaluated after 3 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





# Appendix 1 Data Index

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Student records	Registers/Roll books	All pupils enrolled in the school	<ul style="list-style-type: none"> <li>to comply with legislative or administrative requirements</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>		Indefinitely. Archive when class leaves + 2 years	N/A
Records relating to students/pupils	Enrolment Forms	All pupils enrolled in the school	<ul style="list-style-type: none"> <li>to comply with legislative or administrative requirements</li> <li>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.</li> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that students meet the minimum age requirement for attendance at Primary School.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	This information is kept in a locked filing cabinet in the school office. Permission must be sought from the Principal before accessing this information. Copying of files is not permitted. Information from these forms will be transferred to Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	Confidential shredding
Records relating to students/pupils	Student transfer forms (Applies from primary to primary; from one second-level school to another)	All pupils enrolled in the school	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.</li> </ul>	This information is kept in a locked filing cabinet in the school office. Permission must be sought from the Principal before accessing this information. Copying of files is not permitted. Information from these forms will be transferred to Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	Confidential shredding

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Records relating to students/pupils	Disciplinary notes	All pupils enrolled in the school	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	This information is kept in a locked filing cabinet in the school office. Permission must be sought from the Principal before accessing this information. Copying of files is not permitted. Information from these forms will be transferred to Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	Never destroy	N/A
Records relating to students/pupils	Results of in-school tests/exams (i.e. end of term, end of year exams, assessment results)	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	This information is kept in a locked filing cabinet in the school office. Permission must be sought from the Principal before accessing this information. Copying of files is not permitted. Information from these forms will be transferred to Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school).	Confidential shredding
Records relating to students/pupils	End of term/year reports	All pupils enrolled in the school	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.</li> </ul>	This information is kept in a locked filing cabinet in the Deputy Principals office. Permission must be sought from the Deputy Principal before accessing this information. Copying of files is not permitted. Report cards are completed on Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	Confidential shredding

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Sensitive personal data students and staff	Photographs/video of pupils and staff	All pupils and staff	<ul style="list-style-type: none"> <li>photographs and recorded images of students are taken to celebrate school achievements, e.g. compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school. Photographs are also used as identifying images on Aladdin.</li> </ul>	<ul style="list-style-type: none"> <li>Information may be shared on school displays, the school website, social media</li> </ul>	Photographs are stored on the school server. Staff must use individual usernames and unique passwords to access the school server. Access to the server is only possible on school grounds, over a wired network.	Older photographs/video may be deleted as additional space is required on the server.	Safe/ secure deletion.
Sensitive personal data students	Psychological assessments	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>1. to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.</li> </ul>	This information is kept in a locked filing cabinet in the Deputy Principal's office. Permission must be sought from the Deputy Principal before accessing this information. Copying of files is not permitted.	Never destroy	N/A - Never destroy
Sensitive personal data students	Special Education Needs' files, reviews, correspondence and Individual Education Plans	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.</li> </ul>	This information is kept in a locked filing cabinet in the Deputy Principal's office. Permission must be sought from the Deputy Principal before accessing this information. Copying of files is not permitted. IEPs/plans are completed on Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.	Never destroy	N/A
Sensitive personal data students	Accident reports	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to comply with legislative or administrative requirements</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>Parents/Guardians</li> </ul>	Accident reports are stored in a locked cabinet in the designated first aid area.	Never destroy	N/A

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Sensitive personal data students	Child protection records	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to primary/second-level educational institutions.</li> </ul>	This information is kept in a locked filing cabinet in the Principal's office. Access to this filing cabinet is restricted to the Principal and Deputy Principal. Copying of files is not permitted.	Never destroy	N/A
Sensitive personal data students	Section 29 appeal records	All applicants to the school	<ul style="list-style-type: none"> <li>to comply with legislative or administrative requirements</li> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that students meet the minimum age requirement for attendance at Primary School.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	This information is kept in a locked filing cabinet in the Principal's office. Access to this filing cabinet is restricted to the Principal and Deputy Principal. Copying of files is not permitted.	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	Confidential shredding
Sensitive personal data students	Records of complaints made by parents/guardians	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	This information is kept in a locked filing cabinet in the Principal's office or filed in the pupil's file in a locked filing cabinet in the school office. Access to these filing cabinets is restricted to the Principal and Deputy Principal. Copying of files is not permitted.	Depends entirely on the nature of the complaint. If it is child-safeguarding, a complaint relating to teacher-handling, or an accident, then retain indefinitely. Never destroy. If it is a complaint of a more mundane nature (e.g. misspelling of child's name, parent not being contacted to be informed of parent-teacher meeting) or other minor matter, then student reaching 18 years + 7 years (6 years in which to take a claim, and 1 year for proceedings to be served on school)	Confidential shredding or N/A, depending on the nature of the records.

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Government returns	Any returns which identify individual staff/pupils,	All pupils enrolled in the school (as applicable)	<ul style="list-style-type: none"> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>the management and administration of school business (now and in the future)</li> <li>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)</li> <li>to facilitate pension payments in the future</li> <li>human resources management</li> <li>recording promotions made (documentation relating to promotions applied for) and changes in responsibilities, etc.</li> <li>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)</li> <li>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</li> <li>and for compliance with legislation relevant to the school.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>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</li> </ul>	<p>This information is kept in a locked filing cabinet in the Principal's office, Deputy Principal's office or filed in the pupil's file in a locked filing cabinet in the school office. Access to these filing cabinets is restricted to the Principal and Deputy Principal. Copying of files is not permitted. Information is also stored on Aladdin which is protected with a unique username and password for each user. Information is restricted to relevant staff members only.</p>	<p>Depends upon the nature of the return. If it relates to pay/pension/benefits of staff, keep indefinitely as per DES guidelines. If it relates to information on students, e.g. October Returns, Annual Census etc., keep in line with "Student Records" guidelines above.</p>	N/A

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Board of management records	Board agenda and minutes	All pupils (including prospective pupils), parents (including prospective parents) and staff	<ul style="list-style-type: none"> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that students meet the minimum age requirement for attendance at Primary School.</li> <li>to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities</li> <li>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</li> <li>to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/ information/references to primary/second-level educational institutions.</li> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>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.</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> </ul>	<ul style="list-style-type: none"> <li>to furnish documentation /information about the student to the Department of Education and Skills and TUSLA,</li> </ul>	This information is kept in a locked filing cabinet in the Principal's office. Access to this filing cabinet is restricted to the Principal. Copying of files is not permitted.	Indefinitely. These should be stored securely on school property	N/A
Board of management records	School closure	N/A	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	N/A	On school closure, records should be transferred as per Records Retention in the event of school closure/amalgamation. A decommissioning exercise should take place with respect to archiving and recording data.	N/A

Category	Student Records	Who do we hold information about?	Why do we use this personal data?	Who do we share this information with?	How do we keep this information safe?	When do we dispose of this data?	Final disposition
Other school based reports/activities	CCTV recordings	All pupils, parents, staff and visitors to the school	<ul style="list-style-type: none"> <li>Safety and security of staff, students and visitors and to safeguard school property and equipment.</li> </ul>	<ul style="list-style-type: none"> <li>Gardaí (as requested)</li> </ul>	The recordings are stored on a password protected hard drive. Access is restricted to the Principal and Deputy Principal	28 days in the normal course, but longer on a case-by-case basis e.g. where recordings/images are requested by An Garda Síochána as part of an investigation or where the records /images capture issues such as damage/vandalism to school property and where the images/recordings are retained to investigate those issues.	Safe/secure deletion.
Other school based reports/activities	Principal's monthly report including staff absences	All pupils and staff	<ul style="list-style-type: none"> <li>to enable each student to develop to his/her full potential</li> <li>to comply with legislative or administrative requirements</li> <li>to ensure that eligible students can benefit from the relevant additional teaching or financial supports</li> <li>to support the provision of religious instruction</li> <li>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.</li> <li>to meet the educational, social, physical and emotional requirements of the student</li> <li>to ensure that the student meets the school's admission criteria</li> <li>to ensure that students meet the minimum age requirement for attendance at Primary School.</li> <li>to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities</li> </ul>	<ul style="list-style-type: none"> <li>to furnish documentation /information about the student to the Department of Education and Skills and TUSLA</li> </ul>	This information is kept in a locked filing cabinet in the Principal's office. Access to this filing cabinet is restricted to the Principal. Copying of files is not permitted. This may also be stored electronically on the Principal's password protected, encrypted laptop.	Indefinitely. Administrative log and does not relate to any one employee in particular: the monthly reports are not structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible. Not a "relevant filing system".	N/A

## Appendix 2 G Suite For Education Notice To Parents/Guardians

This notice describes the personal information we provide to Google for these accounts and how Google collects, uses, and discloses personal information from students in connection with these accounts.

Using their G Suite for Education accounts, students may access and use the following “Core Services” offered by Google (described at [https://gsuite.google.com/terms/user\\_features.html](https://gsuite.google.com/terms/user_features.html)):

- Calendar
- Chrome Sync
- Classroom
- Cloud Search
- Contacts
- Docs, Sheets, Slides, Forms
- Drive
- Keep

In addition, we also allow students to access certain other Google services with their G Suite for Education accounts. Specifically, your child may have access to the following “Additional Services”:

- Chrome Web Store
- Google Bookmarks
- Google Chrome Sync
- Google Earth
- Google Maps
- Google Play

Google provides information about the information it collects, as well as how it uses and discloses the information it collects from G Suite for Education accounts in its G Suite for Education Privacy Notice. You can read that notice online at [https://gsuite.google.com/terms/education\\_privacy.html](https://gsuite.google.com/terms/education_privacy.html). You should review this information in its entirety, but below are answers to some common questions:

### 1. WHAT PERSONAL INFORMATION DOES GOOGLE COLLECT?

When creating a student account, Tyrrelstown Educate Together may provide Google with certain personal information about the student, including, for example, a name, email address, and password. Google may also collect personal information directly from students, such as telephone number for account recovery added to the G Suite for Education account.

When a student uses Google services, Google also collects information based on the use of those services. This includes:

- device information, such as the hardware model, operating system version, unique device identifiers, and mobile network information including phone number;

- log information, including details of how a user used Google services, device event information, and the user's Internet protocol (IP) address;
- location information, as determined by various technologies including IP address, GPS, and other sensors;
- unique application numbers, such as application version number; and
- cookies or similar technologies which are used to collect and store information about a browser or device, such as preferred language and other settings.

## **2. HOW DOES GOOGLE USE THIS INFORMATION?**

In G Suite for Education Core Services, Google uses student personal information to provide, maintain, and protect the services. Google does not serve ads in the Core Services or use personal information collected in the Core Services for advertising purposes.

In Google Additional Services, Google uses the information collected from all Additional Services to provide, maintain, protect and improve them, to develop new ones, and to protect Google and its users. Google may also use this information to offer tailored content, such as more relevant search results. Google may combine personal information from one service with information, including personal information, from other Google services.

## **3. DOES GOOGLE USE STUDENT PERSONAL INFORMATION FOR USERS IN PRIMARY SCHOOLS TO TARGET ADVERTISING?**

No. For G Suite for Education users in primary and secondary schools, Google does not use any user personal information (or any information associated with an G Suite for Education Account) to target ads, whether in Core Services or in other Additional Services accessed while using an G Suite for Education account.

## **4. CAN MY CHILD SHARE INFORMATION WITH OTHERS USING THE G SUITE FOR EDUCATION ACCOUNT?**

We may allow students to access Google services such as Google Docs, which include features where users can share information with others or publicly. When users share information publicly, it may be indexable by search engines, including Google.

## **5. WILL GOOGLE DISCLOSE MY CHILD'S PERSONAL INFORMATION?**

Google will not share personal information with companies, organizations and individuals outside of Google unless one of the following circumstances applies:

- With parental or guardian consent. Google will share personal information with companies, organizations or individuals outside of Google when it has parents' consent (for users below the age of consent), which may be obtained through G Suite for Education schools.
- With Tyrrelstown Educate together National School. G Suite for Education accounts, because they are school-managed accounts, give administrators access to information stored in them.

- For external processing. Google may provide personal information to affiliates or other trusted businesses or persons to process it for Google, based on Google's instructions and in compliance with the G Suite for Education privacy notice and any other appropriate confidentiality and security measures.
- For legal reasons. Google will share personal information with companies, organizations or individuals outside of Google if it has a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable Terms of Service, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of Google, Google users or the public as required or permitted by law.
- Google also shares non-personal information -- such as trends about the use of its services -- publicly and with its partners.

## 6. WHAT CHOICES DO I HAVE AS A PARENT OR GUARDIAN?

First, you can consent to the collection and use of your child's information by Google. If you don't provide your consent, we will not create a G Suite for Education account for your child, and Google will not collect or use your child's information as described in this notice.

If you consent to your child's use of G Suite for Education, you can access or request deletion of your child's G Suite for Education account by contacting the school office. If you wish to stop any further collection or use of your child's information, you can request that we use the service controls available to limit your child's access to features or services, or delete your child's account entirely. You and your child can also visit <https://myaccount.google.com> while signed in to the G Suite for Education account to view and manage the personal information and settings of the account.

## 7. WHAT IF I HAVE MORE QUESTIONS OR WOULD LIKE TO READ FURTHER?

If you have questions about our use of Google's G Suite for Education accounts or the choices available to you, please contact the school office. If you want to learn more about how Google collects, uses, and discloses personal information to provide services to us, please review the [G Suite for Education Privacy Center](https://www.google.com/edu/trust/) (at <https://www.google.com/edu/trust/>), the [G Suite for Education Privacy Notice](https://gsuite.google.com/terms/education_privacy.html) (at [https://gsuite.google.com/terms/education\\_privacy.html](https://gsuite.google.com/terms/education_privacy.html)), and the [Google Privacy Policy](https://www.google.com/intl/en/policies/privacy/) (at <https://www.google.com/intl/en/policies/privacy/>).

The Core G Suite for Education services are provided to us under [Google's Apps for Education agreement](https://www.google.com/apps/intl/en/terms/education_terms.html) (at [https://www.google.com/apps/intl/en/terms/education\\_terms.html](https://www.google.com/apps/intl/en/terms/education_terms.html)) (see <https://support.google.com/a/answer/2888485?hl=en>) and the [Data Processing Amendment](https://www.google.com/intl/en/work/apps/terms/dpa_terms.html) (at [https://www.google.com/intl/en/work/apps/terms/dpa\\_terms.html](https://www.google.com/intl/en/work/apps/terms/dpa_terms.html)).