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# HOLY ROSARY PRIMARY SCHOOL

## Data Protection Policy

The principles in this policy are approved by the Board of Management and therefore constitute standard practices, which apply throughout Holy Rosary Primary School.

Signed

Chairperson, Board of Management

Date 21<sup>st</sup> May 2018

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**“Mol an Óige agus tiocfaidh sí”**

“Recognising and embracing the diversity within the community, we are committed to developing the individual pupil in a secure and challenging learning environment”

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# 1 Introduction, Scope and Rational

## 1.1 Introductory Statement

- 1.1.1 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 Personal Regulation (GDPR).
- 1.1.2 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.
- 1.1.3 Data will be stored securely, so that confidential information is protected in compliance with relevant legislation
- 1.1.4 This policy sets out the manner in which personal data and special categories of personal data will be protected by the school.
- 1.1.5 Holy Rosary Primary School 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.
- 1.1.6 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

## 1.2 Scope

- 1.2.1 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.
- 1.2.2 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.

## 1.3 Rational

- 1.3.1 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.
- 1.3.2 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.
- 1.3.3 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.
- 1.3.4 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.

## 2 Definitions

2.1.1 **BoM** – Holy Rosary Board of Management.

2.1.2 **Data Controller** - The Board of Management of the school.

2.1.3 **Data Subject** – An individual who is the subject of personal data.

2.1.4 **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.

2.1.5 **Data Processor** - a person who processes personal information on behalf of the data controller, but **does not include an employee of a data controller** who processes such data in the course of their employment, for example, this might mean an 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. Holy Rosary Primary School uses the following Data Processors – Aladdin, Thesaurus (wages) and School Finance (accounts).

2.1.6 **DP** – Deputy Principal.

2.1.7 **Employer** – Holy Rosary Board of Management.

2.1.8 **Personal Data** - 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).

2.1.8.1 **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

2.1.9 **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.

### **3 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 198 to 2018 and GDPR, which can be summarised as follows:

#### **3.1 Obtain and Process Personal Data Fairly**

- 3.1.1 Information on students is gathered with the help of parents/guardians and staff. Information is also transferred from their previous schools.
- 3.1.2 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.
- 3.1.3 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.

#### **3.2 Consent**

- 3.2.1 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.
- 3.2.2 Holy Rosary Primary School 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.

#### **3.3 Keeping Data**

- 3.3.1 Data will be kept for one or more specified reasons or explicit lawful purposes.
- 3.3.2 The BoM will inform individuals of the reasons they collect their data and the uses to which their data will be put.
- 3.3.3 All information is kept with the best interest of the individual in mind at all times.

#### **3.4 Processing Data**

- 3.4.1 Data will be processed in ways compatible with the purposes for which it was given initially.
- 3.4.2 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.

### **3.5 Keep Personal Data Safe and Secure**

- 3.5.1 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.
- 3.5.2 Portable devices storing personal data (such as laptops) are encrypted and password-protected.

### **3.6 Keep Personal Data Accurate, Complete and Up-to-Date**

- 3.6.1 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.
  - 3.6.1.1 Once informed, the school will make all necessary changes to the relevant records.
- 3.6.2 Records will not be altered or destroyed without proper authorisation.
  - 3.6.2.1 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.

### **3.7 Ensure that it is Adequate, Relevant and Not Excessive**

- 3.7.1 Only the necessary amount of information required to provide an adequate service will be gathered and stored.

### **3.8 Data Retention**

- 3.8.1 Data is retained no longer than is necessary for the specified purpose or purposes for which it was given.
- 3.8.2 As a general rule, the information will be kept for the duration of the individual's time in the school.
- 3.8.3 Thereafter, the school will comply with DES guidelines on the storage of Personal Data relating to a student.
- 3.8.4 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.
- 3.8.5 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.
- 3.8.6 See School Record Retention table Appendix 1.

### **3.9 Data Request**

- 3.9.1 The school will provide a copy of a person's personal data on request.
- 3.9.2 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.

## 4 Other Legal Obligations

- 4.1.1 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:
- 4.1.1.1 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.
- 4.1.1.2 Under **Section 20 of the Education (Welfare) Act, 2000**, the school must maintain a register of all students attending the School.
- 4.1.1.3 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. Holy Rosary Primary School 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.
- 4.1.1.3.1 Where reports on pupils which have been completed by professionals, apart from Holy Rosary Primary School 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.
- 4.1.1.4 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.
- 4.1.1.5 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).
- 4.1.1.5.1 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)
- 4.1.1.6 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.
- 4.1.1.7 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.
- 4.1.1.7.1 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.
- 4.1.1.8 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.
- 4.1.1.9 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).

## 5 Relationship to Characteristic Spirit of the School

5.1.1 Holy Rosary Primary School 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

5.1.2 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.

## 6 Personal Data

The Personal Data records held by the school may include:

### 6.1 Staff Records

6.1.1 **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.

6.1.2 **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
- For compliance with legislation relevant to the school.



### 6.1.3 **Location and Security procedures of Holy Rosary Primary School:**

- 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.
- 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.

## 6.2 **Student Records**

### 6.2.1 **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.
- 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.

6.2.2 **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. Such records are taken and used in accordance with the School Website Privacy Statement Appendix 3.
- 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 second-level educational institutions.

6.2.3 **Location and Security procedures as above:**

- 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.
- 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.

## 6.3 Board of Management Records

6.3.1 **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.

### 6.3.2 **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.

### 6.3.3 **Location and Security procedures as above:**

- 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.
- 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.

## 6.4 **Other Records: Creditors**

### 6.4.1 **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

### 6.4.2 **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.

### 6.4.3 **Location and Security procedures as above:**

- 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.
- 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 CCTV Images / Recordings**

7.1.1 CCTV is installed in Holy Rosary Primary School.

7.1.1.1 Cameras are installed externally outside the main door, at the corner of the staff carpark and in the external porch at side of the school.

7.1.1.2 Cameras are installed internally in the foyer covering the main entrance to the school.

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

7.1.1.4 The viewing station is in the main school administration office.

### **7.1.2 Purposes:**

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

### **7.1.3 Security:**

7.1.3.1 Access to images/recordings is restricted to the Principal and Deputy Principal of the school and all others only by permission of the Principal. 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.

## **8 Examination Results**

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

### **8.1.2 Purposes:**

8.1.2.1 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.

8.1.2.2 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.

### **8.1.3 Location and Security procedures:**

- 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.
- 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.

## 9 Links to other Policies & to Curriculum Delivery

- 9.1.1 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.
- 9.1.2 The following policies may be among those considered. This is not an exhaustive list:
- Pupil Online Database (POD): Collection of the data for the purposes of complying with the Department of Education and Skills' pupil online database.
  - Enrolment Policy (HR-POL-01)
  - Child Protection Policy (HR-POL-02)
  - Code of Behaviour Policy (HR-POL-03)
  - Anti-Bullying Policy (HR-POL-04)
  - Attendance Policy (HR-POL-05)
  - Supervision Policy (HR-POL-06)
  - Administration of Medicines Policy (HR-POL-07)
  - Acceptable Use Policy (HR-POL-08)
  - Critical Incident Policy (HR-POL-09)
  - Health & Safety Policy (HR-POL-10)
  - Career Breaks Policy (HR-POL-11)
  - Special Education Needs Policy (HR-POL-13)

## 10 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.

### 10.1 External Data Processors

- 10.1.1 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.
- 10.1.2 The Holy Rosary Primary School 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.

### 10.2 Personal Data Breaches

- 10.2.1 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.
- 10.2.2 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.
- 10.2.3 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.

### 10.3 Dealing with a Data Access Request

- 10.3.1 Individuals are entitled to a copy of their personal data on written request.
- 10.3.2 The individual is entitled to a copy of their personal data
- 10.3.3 Request must be responded to within one month. An extension may be required e.g. over holiday periods.
- 10.3.4 No fee may be charged except in exceptional circumstances where the requests are repetitive or manifestly unfounded or excessive.
- 10.3.5 No personal data can be supplied relating to another individual apart from the data subject.

### 10.4 Providing Information over the Phone

- 10.4.1 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.

## 11 Implementation Arrangements, Roles & Responsibilities

### 11.1 Implementation

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

### 11.2 Roles & Responsibilities

- 11.2.1 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.
- 11.2.2 The following personnel have responsibility for implementing the Data Protection Policy:

Role	Responsibility
Board of Management	Data Controller
Principal	Implementation of Policy

## 12 Reviewing & Evaluating the Policy

- 12.1.1 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.

## Appendix 1 – Data Retention Periods for Schools

Record	Retention Period
<b><i>Pupil Related</i></b>	
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
<b><i>Interview Records</i></b>	
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.
<b><i>Staff Records</i></b>	
Contract of Employment Teaching Council Registration Vetting Records  Accident/Injury at work Reports	Retention for duration of employment + 7 years  (6 years to make a claim against the school plus 1 year for proceedings to be served on school)
<b><i>Board of Management Records</i></b>	
BOM Agenda and Minutes CCTV Recordings Payroll & Taxation Invoices/receipts Audited Accounts	Indefinitely. 28 days normally. In the event of criminal investigation – as long as is necessary. Revenue require a 6-year period after the end of the tax year. Retain for 7 Years Indefinitely.
<p><b>Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?</b></p> <p>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.</p>	

## Appendix 2 - Holy Rosary Website Privacy Statement

### WEBSITE OF HOLY ROSARY PRIMARY SCHOOL:

Holy Rosary Primary School is committed to preserving the privacy of all visitors to [www.holyrosaryps.ie](http://www.holyrosaryps.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.

Holy Rosary Primary School 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.
- Statistical web site use information collected on an aggregate basis as you and others browse through our website.

### 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. Holy Rosary Primary School 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 Holy Rosary Primary School 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.

## **WHAT ARE COOKIES?**

Cookies are a feature of web browser software that allows web servers to recognise the computer used to access a website. Cookies are small pieces of data that are stored by a user's web browser on the user's hard drive.

Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that web site by the same user or to use the information to streamline the web page and to complete commercial transactions over the Internet. Cookies should make your online experience easier and more personalized.

Our website uses cookies to keep track of your access to the site. By using our website, you agree that we can place these types of cookies on your device.

Your browser will give you the option of preventing websites using cookies, or deleting cookies that have been accepted. Your browser's help service or help manual will show you how this is done. If you do not want your browser to accept cookies, you can "turn off" the cookie acceptance setting on your browser setting. However you must note that this may stop our website from working properly on your device. If you do not change your browser settings to refuse cookies, our website will issue cookies when you visit our website. If you continue to use our website, you agree and consent to our use of cookies on your device.

## **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 Holy Rosary Primary School at Old Court Ave., Firhouse, Dublin 24 and ask that it provides you with an Access Request Form. Your request will be dealt with as soon as possible and will not take more than a month to process. If you discover that Holy Rosary primary School 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. You're 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 is processed by our website, please bring your concerns to our attention using the contact details below:

The Board of Management,  
Holy Rosary Primary School,  
Old Court Avenue,  
Firhouse,  
Dublin 24

Or by email to [holyrosaryps1@gmail.com](mailto:holyrosaryps1@gmail.com)

### Briefing Note

<p><b>Purpose:</b></p> <p>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 Personal Regulation (GDPR).</p>	<p><b>Scope:</b></p> <p>The policy applies to all school staff, the Board of Management, parents/guardians, students and others.</p>
<p><b>What’s New / What’s Changed &amp; Why?</b></p> <p>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.</p> <p>The policy explains the school’s data protection principles including:</p> <ul style="list-style-type: none"> <li>• Obtaining &amp; processing data fairly</li> <li>• Processing data</li> <li>• Data is adequate, relevant &amp; non excessive</li> <li>• Consent</li> <li>• Safety &amp; security</li> <li>• Data requests</li> <li>• Keeping data</li> <li>• Data retention</li> </ul> <p>The policy lists the types of personal data that is kept and its purpose. This includes:</p> <ul style="list-style-type: none"> <li>• Staff records</li> <li>• Student records</li> <li>• BoM records</li> <li>• Other records i.e. Creditors</li> </ul>	
<p><b>Target Audience:</b></p> <p>A full briefing of Holy Rosary staff and Board of Management.                  Publication on the school website to inform Parents, Students and others.</p>	
<p><b>Note:</b></p> <p>Advise target audience to read thoroughly any sections that affect them directly.                  Be more specific and expand on sections as appropriate for the audience.                  Encourage feedback. If any feedback, Briefer should forward details to the Principal.</p>	

Version No.	Date	Comments
1.0	21 <sup>st</sup> May 2018	Initial Release

