



Data Protection / GDPR Policy

Our Lady's Girls' NS

Ballinteer Avenue

Dublin 16

19396J

Introduction & Rationale:

The purpose of the policy is to identify the records required to be retained by the school and to ensure confidentiality and manageable procedures in relation to access to such records by parents, staff and other stakeholders.

Individuals have a number of rights in relation to their personal information – i.e. personal data – and these rights have been enhanced by the General Data Protection Regulation (GDPR). This Data Protection Statement describes how we at Our Lady's Girls' National School collect and process personal data, in accordance with the GDPR and the school's legal obligations generally in relation to the provision of education. Processing is the legal term used to describe various acts including – the collection, recording, organisation, structuring, storage, alteration, use of, retrieval, disclosure or transmission of information.

This Statement applies to all school staff, the Board of Management, pupils, parents/ guardians and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school). By enrolling your child in and/or by attending Our Lady's Girls' National School you acknowledge and agree to the collection and processing of personal information by the school.

A policy must be put in place to ensure a school complies with legislation such as;

- Education Act 1998
- Education Welfare Act 2000
- Data Protection Act 2003

- Freedom of Information Act 1997
- The National Strategy to improve Literacy and Numeracy among Children and Young People 2011 – 2020

Details of arrangements in place to ensure compliance with the eight rules of data protection:

The policy will be implemented so as to ensure that all personal data records held by the school are obtained, processed, used and retained in accordance with the following eight rules of data protection (based on the Data Protection Acts):

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes
8. Give a copy of his/her personal data to that individual on request.

Aims/Objectives:

- To ensure the school complies with legislative requirements
- To clarify the types of records maintained and the procedures relating to making them available to the relevant bodies
- To put in place a proper recording and reporting framework on the educational progress of pupils
- To establish clear guidelines on making these records available to parents and pupils over 18 years of age.
- To stipulate the length of time records and reports will be retained

Guidelines:

The Board of Management assumes the function of data controller and supervises the application of data protection within the school. The data under the control of the Board of Management comes under the following headings. The principal will act as Data Protection Officer (DPO). The DPO will assist the organisation in monitoring internal compliance with the GDPR.

Who we are and how to contact us:

If you have any questions about this data protection statement, including any request to exercise your legal rights, please contact us using this email: info@ourladysgns.ie.

Information Collected:

1. Personal Data of Pupils:

This data relates to personal details of the students such as name, address, date of birth, gender, family status,

parents' place of employment, ethnic origin, nationality, religious belief, medical details, additional educational needs, child protection information, dietary information, PPSN, home telephone and mobile contact details. It also includes the names of students' parents/guardians. This information may be included in the School Enrolment Form. These forms are locked securely in the Principal's Office. Name, address, contact numbers for Parents/Guardians of pupils are stored in both hard and soft copy format and kept in the secretary's office. Parents/Guardians are asked to update contact details annually. Photos of students with medical issues may be displayed in the staffroom with information on procedures if a medical emergency occurs. Parental consent will be sought in this case.

Student Records:

The purpose for keeping student records includes, but is not limited to, the following:

- To enable each student to develop his/her full potential.
- To comply with legislative and administrative requirements.
- To ensure that eligible students can benefit from the relevant additional teaching/ resource/ other supports.
- To support the provision of support teaching.
- To support the provision of religious instruction and sacramental preparation.
- To ensure that the student fulfils the criteria for the exemption from Irish.
- To enable parents/guardians to be contacted in the case of emergency/ school closure etc.
- To ensure that the pupil meets the school's admission criteria.
- To maintain a record of the student's progress through school.
- To maintain accurate accident/incident reports.
- To communicate clearly with all educational partners.
- To support medical/special needs conditions within the school environment.
- photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school. Such records are taken and used in accordance with the school's Acceptable Usage Policy ie: parents need to give consent for photographs to be used.
- To furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, Health Services, and other Schools etc. in compliance with law and directions issued by government departments.

Student records outlined below are locked securely in a filing cabinet by each class teacher.

Such student records may contain:

- Personal details of the student (same as above - information collected - Point 1) accessed through Aladdin online, no hard copies
- School report cards
- Attendance Records (stored on Aladdin – National Online Database, Aladdin GDPR policy - <https://www.aladdin.ie/content/privacy>)
- School Support Plans and records of meetings with the stakeholders regarding these plans
- SET data such as records of permissions/refusals to allow children access to SET services in the school
- Academic records, school reports, pupil learning needs, pupil behaviour needs, permission for access to educational reports, individual education and learning support plans, Standardised Test Results, teacher-designed tests

- Portfolios of student work e.g. Projects/Art and achievements on diagnostic tests Spreadsheet of Standardised test results
- Personal pupil profiles (PPPs)
- Information for Primary Online Database (POD)
- Permission slips for trips or activities outside of school, permission to be photographed
- Acceptable Use Policy (AUP)

The following records are stored securely in the Principal's Office:

- Psychological Assessments
- Assessment results carried out by professionals to assist teaching and learning (e.g. results of psychiatric reports; occupational therapy reports; speech and language assessments; etc.). Standardised Test Results
- Screening Tests Diagnostic Tests Reports
- Records of students who have been granted exemption for the study of Irish. School Support Plans and records of meetings with the stakeholders regarding these plans.
- Child Protection concerns and HSE referrals
- Minutes of HSE Child Protection Conferences / Meaitheal meeting (meeting with any professionals and working with child - OTs, Speech and Language, Psychologists etc. Also includes parents/guardians and teachers)

The following records are stored securely in the Learning Support Room (Room 10) and on child's Aladdin online profile:

- Copy of Psychological Assessments
- Assessment results carried out by professionals to assist teaching and learning (e.g. results of psychiatric reports; occupational therapy reports; speech and language assessments; etc.). Standardised Test Results and Screening Tests such as N.R.I.T. Diagnostic Tests Reports
- School Support Plans and records of meetings with these stakeholders regarding these plans
- Records of students who have been granted exemption for the study of Irish.

Administrative Data (Locked securely in principals and secretary office):

- Attendance Reports, Roll Book, Registers; Class files; Pupil Profile files; Enrolment applications; baptismal certificate copy (where applicable); birth certificate copy, passport copy if necessary.
- Correspondence between parents and teachers
- Accident Report Book detailing injury and treatment applied
- Administration of Medicines Indemnity Forms
- Late arrivals / Early Departures record copy (kept by individual class teachers) · Records of books rented under book-rental scheme and books borrowed from school library · Pupil behaviour records and Records of allegations/ incidents of bullying and alleged bullying;(manually recorded notes), (kept in Principal's Office)
- Records kept in line with Children First Procedures (Child Protection) in Principal's Office

Board of Management records (locked securely in principal's office):

- Name, address and contact details of each member of the Board of Management
- Records in relation to appointments to the Board
- Minutes of Board of Management meetings and correspondence to the Board which may include references to particular individuals.
- Minutes, reports and correspondence relating to the Board of Management are kept in the Principal's office. Child Protection/Attendance matters reported to the Board will not identify a pupil by name except in exceptional circumstances.
- Board members agree to confidentiality and will delete any minutes/board information sent through email/post once it has been read.

The purpose for keeping Board of Management records include:

- A record of how legislative requirements are carried out.
- A record of staff appointments
- Documenting decisions made by the board.
- A record of how enrolment to the school is managed.
- A record of the financial management of the school
- A record of the development of the school
- A record of how health and safety issues within the school are managed.
- A record of policy development within the school
- A record of insurance cover and related issues
- A record of capital development and building/grounds maintenance
- Documentation relating to grievance and disciplinary procedures.

Access to Records:

The following will have access where relevant and appropriate to the data listed above where pupils are identified by name (in some cases parental consent may be necessary):

- Parents/Guardians
- Past Pupils over 18
- Health Service Executive staff
- National Educational Psychological Service
- National Education Welfare Board
- TUSLA
- Occupational Therapists/Psychologists/Speech Therapists working with pupils
- Designated School Personnel
- Department of Education and Skills (where necessary)
- First and Second level schools (where relevant)
- CDNT (Children's Disability Network Team)

With the exception of child protection-related data which is governed by "Children's First Guidelines 'Child Safeguarding Procedures 2017'", data on attendance, (governed by NEWB/TUSLA) and data regarding

achievements in literacy and numeracy, (governed by National Strategy for literacy and numeracy), parental authorisation must be provided by parents in the event of data being transferred to outside agencies. Outside agencies requesting access to records must do so in writing. Parents/Guardians of current pupils can make such a request in writing. Past pupils and parents of past pupils seeking data must do so in writing.

The Annual School Report is issued by post and or on Aladdin Connect in June to all parents/guardians.

2. Staff Data

Staff records are kept for the following purposes:

- 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).
- 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.

Staff records may include name, address, contact details, payroll number, PPSN, qualifications, records of interview procedures, results of interview process, Interview board recommendations to BOM, BOM recommendations to Bishop, contracts, pension details, references, curriculum vitae, job applications, attendance records, Teaching Council registration Garda Clearance, Statutory Declaration where necessary, Medical Fitness to Teach, AUP, Child Safeguarding CPD Certificate. Access is restricted to the Principal and Secretary. Records are destroyed by way of shredding when no longer required. See appendix - Records Retention Schedule.

These records are kept in the Principal's office. Attendance details are recorded on the OLCS system, are password protected and are accessed by the Secretary, the Principal and the Chairperson of the Board of Management if necessary.

Continuous Professional Development certificates are retained in the secretary's office.

Storage:

Old records are stored securely in the strong room. Records are stored until pupils reach the age of 21 years. In the case of children with Special Educational Needs, records are stored until they reach the age of 25 years. See appendix Records Retention Schedule.

All completed school Roll Books, Registers and Leabhar Tinrimh are stored in the Principal's office. Access to these stored files is restricted to authorised personnel only. For computerised records, systems are password protected.

Access to Pupil Records:

A parent may apply for access to their records until the child reaches the age of 18 years. A past pupil may apply for access to their own records from the age of 18 years to 25 years.

A written application will be required, accompanied by a form of identification and Birth Certificate. Records will be provided within 21 days.

Transfer of Student Records:

When a pupil transfers to a Secondary School or another Primary School the new school will notify the original school and the original school will transfer records of attendance and educational progress to them.

CCTV data usage:

CCTV cameras are in operation at various locations around the school.

Use of CCTV images;

The use of this CCTV system is intended primarily to ensure the security of the school premises and its contents. The CCTV system may be used to capture images of intruders or of individuals damaging property or removing goods without authorisation. A sign informing data subjects that the CCTV system is in operation is displayed at the entrance to the school.

Images captured by the CCTV system will be retained on the monitor for a week. In exceptional circumstances images may be retained where an investigation by An Garda Síochána is ongoing or where such images are the subject of court proceedings.

Any person whose image has been recorded has a right to be given a copy of the information recorded. To exercise that right, a person must make an application in writing. A data controller will respond to such a request within 40 days.

Practically, a person must provide necessary information to the data controller, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data.

In giving a person a copy of his/her data, the data controller may provide a still/series of still pictures, a tape or a disk with relevant images. However, other people's images will be obscured before the data are released.

Consent

Our Lady's Girls' National School sometimes processes some pupils' personal information with consent e.g. photograph which may be displayed on the school's website or on social media platforms or in the print media. Please note that consent can be withdrawn at any time by contacting the school. This is highlighted in the Acceptable Usage Policy.

How personal data is collected:**Pupils**

Our Lady's Girls' National School collects personal information about pupils through the enrolment process. Additional information is collected from third parties, including former schools and through school activities, assessments and general interaction(s) during the course of the pupil's time at Our Lady's Girls' National School.

Parents and Guardians

Our Lady's Girls' National School collects personal information about parents and guardians through the enrolment process. We collect additional personal information through general interaction during the course of the pupil's time at Our Lady's Girls' National School.

Staff

Our Lady's Girls' National School collects personal information about staff through the application and appointment process. We collect additional personal information through general interaction during the course of the employee's time at Our Lady's Girls' National School.

Board of Management

Our Lady's Girls' National School collects personal information about The Board of Management members through the appointment process.

Third Parties

Our Lady's Girls' National School may receive from, share and/or transfer information to a range of third parties such as the following:

- The Department of Education (DES)
- TUSLA – the Child and Family Agency & TUSLA Education Support Service (TESS)
- Health Service Executive (HSE)
- The National Council for Special Education (NCSE)
- National Educational Psychological Service (NEPS)
- Department of Social Protection and/or other state benefit providers
- An Garda Síochána
- School Insurance Provider
- PPP co. /NDFA and Sensori Co.
- Third Party Service Providers: We may share personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers including, printers, lawyers and other advisors, and providers of security and administrative services, including data processing / cloud storage service providers e.g. Aladdin being our administrative system.
- Other schools (School Transfers)
- External Sports coaches or teachers.
- Universities, Colleges of Further Education etc.

Data Retention:

We will only retain personal information for as long as it is necessary to fulfil the purposes the information was

collected for, including any legal, accounting or reporting requirements.

- See Records Retention Schedule included within the Appendix

Transfer of personal information outside of the EU

Our Lady's Girls' National School may transfer the personal information we collect to countries outside the EU. Where there is no adequacy decision by the European Commission in respect of any such country that means that that country is deemed not to provide an adequate level of protection for your data. However, to ensure personal information does receive an adequate level of protection we will in such circumstances put in place appropriate measures such as the use of model contractual clauses as approved by the European Commission to ensure personal information is treated by those third parties in ways that are consistent with respect to EU and Irish Laws on Data Protection

Individual Rights

Individuals have several rights under GDPR which in certain circumstances are limited and/or constrained. These individual rights include the right (*free of charge and subject to any limitations as may apply*) to:

1. Request a copy of the personal information held about the individual;
2. Rectify any inaccurate personal data held about the individual;
3. Erase personal information held about the individual;
4. Restrict the processing of individual personal information;
5. Object to the use of individual personal information for our legitimate interests;
6. Receive individual personal information in a structured commonly used and machine-readable format and to have that data transmitted to another data controller.

If you wish to exercise any of these rights please contact us at the school as outlined info@ourladysgns.ie with **Request for Data** in the subject line.

Our Lady's Girls' National School will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission.

Success Criteria:

- Compliance with Data Protection Act and Statute of Limitations Act
- Easy access to records
- Framework in place for ease of compilation and reporting
- Manageable storage of records

Destruction of Data

- All hardcopies of records no longer needed are shredded by the secretary
- All soft copies of data no longer needed are permanently deleted by relevant staff members

Principal: John My

Date: 13/6/24

Chairperson: Elizabeth Murray

Date: 13 June 2024

APPENDIX

Appendix - Data Retention Periods for schools

Pupil Related	Retention Periods
School Register/Roll Books Enrolment Forms Disciplinary notes Test Results – Standardised Psychological Assessments etc. SEN Files/IEPS Accident Reports Child Protection Reports/Records	Indefinitely Hold until Pupil is 25 Years Never Destroy Hold until pupil is 25 Years Never Destroy Never Destroy

S.29 Appeals	Never Destroy Never Destroy Never Destroy
Interview Records	
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
Staff Records	
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)
BoM Records	
BOM Agenda and Minutes CC TV 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
<i>Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?</i>	

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.

This data protection policy document will be reviewed accordingly. The record below will indicate a scheduled review as well as ad hoc revisions with notes documenting historical edits with version commentary.

Version	Review/Revision Date	Authors	Approved by	Notes
1.1	June 2025			Initial draft of the Data Protection / GDPR Policy, Our Lady's Girls' NS Ballinteer