



Data Protection Policy

Gaelscoil na Mí



Data Protection Policy

Introduction

Gaelscoil Na Mí promotes openness and co-operation between staff, parents and pupils as a means of providing a caring environment through which a child can develop and grow to his or her full potential. This can best be achieved where there is openness, transparency and co-operation between staff, parents, pupils and other stakeholders.

This policy was formulated by Staff and Board of Management of Gaelscoil Na Mí to identify the records required to be retained by the school to achieve this and to ensure confidentiality and manageable procedures in relation to access to such records by parents, pupils and stakeholders. Should there be any discrepancy between the Irish and English in this policy, it is accepted that the Irish is the correct version.

Rationale

A policy on data protection and record keeping is necessary to ensure that the school has proper procedures in place in relation to accountability and transparency.

It is good practice to record pupil progress so as to identify learning needs.

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

- Education Act, Section 9(g) requiring a school to provide access to records to students over 18 and their parents
- Education Welfare Act 2000 – including provisions requiring a school to report school attendance, the transfer of pupils to other schools and communications with the Education Welfare Officer
- Data Protection Act 1998 and the Data Protection (Amendment) Act 2003
- Circular Letter 0056/2011 -regarding the implementation of the National Literacy and Numeracy Strategy regarding Assessment
- Circular Letter 0024/2013 -regarding the online claims system in recognized primary schools
- 0025/2015 Primary Online Database (POD)
- General Data Protection Regulation May 2018 (GDPR)

Aims and Objectives

- To establish a clear understanding in consultation with staff, parents and management as to the type of staff records that are maintained and how such records should be made available
- To ensure that Gaelscoil Na Mí complies with legislative requirements regarding the data protection entitlements of pupils, staff and other members of the school community
- To put in place proper records on the educational progress of pupils thereby enabling parents and staff to support a child's learning in a meaningful and constructive manner and to ensure that eligible pupils benefit from relevant additional teaching and financial supports
- To report to parents in a meaningful way on the educational progress of their pupils
- To establish clear guidelines on making these records available to parents, stakeholders and past pupils (over 18)
- To stipulate the length of time records and reports will be retained and the manner in which they will be retained

The Eight Rules of Data Protection

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 the information for no longer than is necessary
8. Give a copy of his/her personal data to that individual on request

Scope

Data: What is meant by data is information collected in a form that can be processed. For the purposes of this policy, it includes automated data (information on computer or information recorded with the intention of putting it on a computer) and manual data (information that is kept as part of a relevant filing system or with the intention that it should form part of a filing system).

Relevant Filing System: This refers to any set of information that, while not computerised, is structured by reference to individuals with whom the school has business, so that specific information relating to a particular individual is readily accessible.

Personal Data: This refers to data belonging to an individual who is identifiable by this data or from any other personal data that is in possession of the Data Protection Officer.

Guidelines

The Board is the Data Protection Controller.

(i) Personal Data

This data relates to personal details of pupils such as name, address, date of birth, gender, nationality, ethnic origin (optional), religion (optional), medical details, dietary information, PPSN, contact details and parents' names. Parents/Guardians reserve the right not to disclose details related to ethnic origin/background or religious beliefs.

Medical records are kept in a folder with Medical Administration permission, held in a locked cabinet by the staff member in charge of Health and Safety.

Sheets from Yard Duty Supervision are held by class teachers in folders in a locked cabinet once they are filled. They are given to the secretary at the end of the year to put in storage.

All assessments/reports are kept in a locked filing cabinet/room in the office of the Special Education Co-ordinator.

Records from past pupils are kept in the *Cartlann Scoile* which is always locked.

These records are retained in manual form in a locked press/room in the Oifig an Rúnaí, in electronic form on school password protected computers and on school databases/spreadsheets including Aladdin. The Principal, secretary and Chairperson have access to these records.

(ii) Pupil Records

Pupil records are held by each class teacher in a locked cabinet. A computerized school database is also used. Psychological/Clinical/Occupational Therapy/Speech & Language Assessments are held in the Special Education Co-ordinator's office which is locked.

(iii) Staff Data

This data relates to personal and professional details of the Staff such as name, address, date of birth, contact details, payroll number, attendance records, qualifications, school records, sick leave, Teaching Council Certificates, Vetting Certificates, Continuous Professional Development, curriculum vitae, school returns, classes taught and seniority.

Staff records are held in a locked cabinet in the Principal's office. The Chairperson and the Principal have access to these records. Some limited staff information is kept in the Secretary's office with access by the secretary, Principal and Chairperson.

(iv) Administrative Data

This data includes data such as:

- Supervision Record Sheets – update Aladdin re serious incidents. Once sheet is filled, keep in folder provided in classroom in locked drawer and give to secretary at end of year to file.
- Administration of Medicines Indemnity Form
- Policies
- HSE files, Tusla, Gardaí, Aladdin, Department of Education
- Accounts
- Attendance Reports

Some of these records are retained in manual form in Oifig an Rúnaí, others in Oifig an Phríomhoide and in electronic form on the school database which is currently Aladdin.

(v) Board of Management files

Board of Management files which may routinely include:

- The names and contact details of each member of the Board Details of appointments to the Board
- School accounts, grant payments Minutes of Board meetings
- Correspondence to the board which may include references to individuals
- Some of these records are kept in oifig an Rúnaí, some retained in the Principal's office in manual and electronic form. The Principal, Chairperson and the Treasurer have access where appropriate

(vi) Garda Vetting Policy

As a part of our Garda Vetting Policy, parents/persons who wish to volunteer their services to the school that may involve direct contact with school children must be vetted through the school Patron. The information that is collected and subsequently returned to the school by the Patron body is private and sensitive and can only be seen by the school Principal and another named individual on the school Board of Management (namely the Chairperson). This information is stored in the Principal's office.

Access to Records

The following will have access where relevant and appropriate to the data listed above;

- Parents/guardians Past pupils over 18
- Health Service Executive/Outside Agencies
- Designated school personnel (as specified above) Department of Education
- First and second-level schools (where relevant).
- Parents Association – through permission on enrolment form

Parental consent must be given in the event of data being transferred to outside agencies such as health professionals etc. Parents/Guardians must give such consent in writing. Outside agencies requesting access to records must do so in writing. The right to erasure or rectification of inaccurate information is available by request in writing to the data protection officer.

Responding to Requests

The Board will respond to requests within 30 days of receipt of request.

Annual End-of-Year School Report Form

A standardized school report form is used which is issued in June of each year.

Transferring school

The 6th class Education passport is automatically sent to the relevant secondary school, upon receipt of confirmation that they have been enrolled there.

If a transfer takes place in any other class, consent from parents/guardians will be sought in writing to transfer information to the new school.

Storage

(i) Pupil records are stored in the school until the pupil is 25 years of age.

Records are retained on the school database. Other documents/ reports are stored indefinitely in secure storage on the school premises (see Appendix 1). Access to computerized records are password protected

(ii) Staff data is stored as per Appendix 1

(iii) Other data is stored in line with departmental guidelines

(iv) A pupil profile and selection of records are held by each teacher in his/her individual classroom and passed on to the next teacher as the child moves to the next class

(v) All personal printouts are destroyed before disposal

(vi) Access to these stored files is restricted to authorized personnel only

NB: Please refer to Appendix 1 for more detailed information regarding Safe storage and retention periods for different information.

Electronic Data Storage

We gather and process children's personal data for the purposes of administering the education of our students. To facilitate this, we will input each child's data into the schools Management Information System, Aladdin. Aladdin is a secure software as a service application which is owned and run by Cloudware Ltd. (T/A Aladdin Schools), from where the data is only processed for the above purpose.

The school's database is hosted off the premises by a contracted third-party (currently Aladdin Connect). Aladdin Connect is used to seek permission for specific trips, tours, walks, outings etc.

A limited set of electronic records will be held in the school. The storage appliances for these records will be secured in the building and the storage media encrypted. Backups are made to an off-site (cloud-based) provider. These backups will be encrypted in transit (over the internet to the provider) and at rest (stored on the provider's appliances).

The educational platforms that are in use in Gaelscoil Na Mí include: Seesaw, Google Classroom, Gsuite, Zoom, Meet, Teams

Data Breach Reporting

Any breach of the school's data protection policies and procedures will result in an investigation by the Board of Management. If the breach results in the loss or leakage of personal data it will be reported to the Office of the Data Protection Commissioner within 72 hours, even if the investigation is not yet complete. Breaches that are likely to bring harm to an individual – such as identity theft or breach of confidentiality – will also result in the concerned individual(s) being notified.

Consent for Photographs

On enrolment, written consent/Consent through Aladdin Connect from parents for pupils to appear in photographs taken at school events with the possibility they may appear on social media is sought. The consent may be withdrawn at any time by notifying the Board of Management in writing.

For the purposes of taking photographs of school events, the school has provided two Android 'Real Me' phones. One will be kept in the staffroom downstairs, the other in a Learning Support room upstairs with the Deputy Principal.

Staff may not use personal phones to take photos during school.

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.
- Access to photocopiers by unique pin code for all staff

Roles and Responsibilities

The school staff, under the direction of the Principal will implement and monitor this policy. Individual teachers will design, administer and record all in-class testing. The Principal will ensure records are properly maintained and stored.

Review

This policy will be reviewed as the need arises.

Ratification and Communication

This policy was ratified at a Board of Management meeting.

A copy of this policy will be made available to staff, the PA and each parent through the school website.

Sínithe: _____

Príomhoide

Cathaoirleach

Dáta: _____

Tréimhsí maidir le coinneáil eolais



Daltaí

1. Foirmeacha Clárúcháin..... Go mbeidh an dalta 25 bliain d'aois
2. Torthaí sna Scrúduithe Chaighdeánacha..... Go mbeidh an dalta 25 bliain d'aois
3. Measúnuithe Shiceolaíochta &rl..... Go deo
4. IEPS/Fillteáin don Oideachas Speisialta..... Go deo
5. Tuairiscí ar Thimpistí..... Go deo
6. Taifid/Tuairiscí Chosaint Leanaí..... Go deo
7. Achomhairc Roinn 29..... Go deo
8. Leabhair Rolla..... Go deo
9. Nótaí Smachta..... Go deo
10. Eachtraí bulaíochta (liamhnaithe nó cruthaithe)..... Go deo

Agallaimh & Foireann

1. Nótaí ón mBord Agallaimh, Scéim mharcála, nótaí an Bhoird Bhainistíochta (iarratasóirí nár ceapadh)..... 18 mí ó dheireadh an chomórtais
2. Conradh fostaíochta..... Fad na fostaíochta móide 7 mbliana
3. Clárúchán leis an gComhairle Mhúinteoireachta..... Fad na fostaíochta móide 7 mbliana
4. Tuairiscí maidir le timpistí/gortú san áit oibre..... Fad na fostaíochta móide 7 mbliana
5. Nochtadh Ríomhfhiosrú na nGardaí..... 3 bliana ó dháta an nocht

Bord Bainistíochta

1. Clár & Miontuairiscí an BB..... Go deo
2. Nótaí a ghlacann ball boird ag an gcuinniú..... Scríos ag deireadh an chruinnithe
3. Taifead CCTV (Caithfidh go mbeidh comharthaí in airde & polasaí i bhfeidhm nó níl cead taifead)..... 28 lá de ghnáth. Má bhíonn fiosrúchán coiriúil ann – coinneáil don tréimhse sin
4. Párola & Cáin..... 6 bliana tar éis dheireadh na bliana sin
5. Sonraisc/Admhálacha..... 7 mbliana
6. Cuntais Iniúchtha..... Go deo
7. Sláinte & Sábháilteacht – timpistí ar scoil..... 10 mbliana