



DATA PROTECTION POLICY

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 Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the BoM and any processor engaged by the BoM shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk,

The policy applies to all school staff, the Board of Management (BoM), 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

St. Brigid's GNS 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. ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
4. assess the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident
5. ensure a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing
6. document our data protection procedures
7. enhance accountability and transparency

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The BoM and any processor engaged by them shall take steps to ensure that any natural person acting under the authority of the BoM or the processor, who has access to personal data, does not process them except on instructions from the BoM, unless he or she is required to do so by Union or Irish law.

DATA PROTECTION PRINCIPLES

The 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:

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.

In addition to data, obtained from the data subject and processed by consent, the following additional categories of lawful processing, specified in Article 6(1) of GDPR may arise:

- a) processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; or
- b) processing necessary for compliance with a legal obligation to which the BoM is subject; or
- c) processing necessary in order to protect the vital interests of the data subject or of another natural person; or
- d) processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the BoM;
- e) processing necessary for the purposes of the legitimate interests pursued by the BoM or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

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. St. Brigid's GNS 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. 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

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

5. Keep Personal Data safe and secure

Only those with a legitimate 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 password-protected

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

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

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. See **Records Retention Schedule for St. Brigid's GNS.**

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.

Individuals also have the right to have incorrect or inaccurate data amended. Furthermore, the right to be forgotten and the right to data portability, in accordance with the Articles 19 and 20 of GDPR, apply.

SCOPE

The Data Protection domestic legislation and GDPR apply to the keeping and processing of *Personal Data*. The purpose of this policy is to assist the school to meet its legal 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

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)

Sensitive Personal Data is defined in the Data Protection (Amendment) Act 2003 as personal data as to

- a) the racial or ethnic origin, the political opinions or the religious or philosophical beliefs of the data subject
- b) whether the data subject is a member of a trade union
- c) the physical or mental health or condition or sexual life of the data subject
- d) the commission or alleged commission of any offence by the data subject or
- e) any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceeding

Special Categories of Personal Data is defined in Article 9 of GDPR as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

For the purposes of this document, the term "sensitive personal data" includes "special categories of personal data".

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. Such data processors include Aladdin; Digiwatch; McGoverns Accountants; PC Peripherals, Marsh Ireland, Allianz, HSA, Diamond Point (utilised by Digiwatch), and persons engaged from time to time as School Photographers.

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

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

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. St. Brigid's GNS 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 St. Brigid's GNS 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 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. 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)

RELATIONSHIP TO CHARACTERISTIC SPIRIT OF THE SCHOOL:

St. Brigid’s GNS 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.

PERSONAL DATA

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

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 St. Brigid's GNS:*

- a. Manual records are kept in a secure, locked press 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 currently stored on the school server, only accessible through Principal's laptop which remains in the Principal's office at all times. The laptop is password protected, with the password only known by the Principal and Deputy Principal of the school. The school has the burglar alarm activated during out-of-school hours.

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 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. On enrolling their daughter, Parents/Guardians are provided with the option to give their written consent for their child to be photographed and their child's image to be displayed in the school or on the school website. If consent is not given by Parents/Guardians, the child will not be photographed or their image is obscured should they appear in a group photo.
- 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.

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

- Pupil files are held by the class teachers for the duration of the relevant school year. All teachers use a lockable press in their rooms for this purpose that can be accessed only by the teacher.
- Save as aforesaid, general personal data, required by the Patron or the Minister to be retained relating to pupils, is held in the School Secretary's office.
- Data that is potentially sensitive, such as files on child safeguarding issues, NEPS assessments and like matters, is retained in the Principal's office.
- When a pupil leaves the school on completion of 6th Class, files are archive boxed, sealed and stored at height in the PE store room in the hall. This storeroom is locked each evening. The location of the files, within the storeroom, is inaccessible during the day without the use of steps or ladder.
- Secure locked filing cabinets are provided in both the School Secretary's and Principal's offices.
- The Aladdin system is the cloud based system used for electronically stored data. This can only be accessed through a password protected website.

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): PE storeroom as is the case with archived children's files

4. Other Records: 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): PE Storeroom as is the case with archived children's file.

5. Other Records: 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.

c) (Location and Security procedures as above): PE storeroom as is the case with archived children's files

6. Other Records: Primary Online Database – POD

Student records are also stored electronically on a Primary Online Database(POD) hosted by the Department of Education and Skills. There will be three categories of personal Data stored on the POD.

Category 1 – personal data shared between the school and the Department of Education and Skills.

Category 2 – sensitive personal data shared between the school and the Department of Education and Skills.

Category 3 – personal data, including sensitive data, which is only accessible to the school.

Full details of all aspects of the Department of Education & Skills Primary Online Database (POD) can be found in DES Circular 0017/2014 Fair Processing Notice available at www.education.ie or a hardcopy of circular 0017/2014 is available on request from the school office.

CCTV IMAGES/RECORDINGS-

CCTV is installed in St. Brigid's GNS.
Fourteen cameras are installed externally

External

- Camera 1. – Junior Exit door.
- Camera 2. – Main school entrance.
- Camera 3. – Rear visitor's carpark.
- Camera 4. – Perimeter wall of visitor carpark at ground level adjacent to Drama room & emergency exit.
- Camera 5. – Back perimeter wall adjacent to lane, boiler house & senior corridor.
- Camera 6. – Bottom of senior yard.
- Camera 7. – Junior yard at junior exit and steps.
- Camera 8. – Ramp outside school hall.
- Camera 9. – Senior yard at senior yard exit.
- Camera 10. – Visitor carpark & emergency exit.
- Camera 11. – Junior yard shelters & soft red play area.
- Camera 12. – Bottom left emergency exit from school hall.
- Camera 13. – Perimeter wall adjacent to laneway.
- Camera 15. – Senior yard.

One camera is installed internally;

Internal

Camera 14. The Reception/Lobby/Front door area

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, Deputy Principal & Caretaker 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 and GDPR.

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.

Location and Security procedures

Principal's office while children are still in the school and then into archive storage in the PE Storeroom when the children have left the school.

PROTECTION AGAINST VIRUSES AND MALWARE:

The Board of Management, in cooperation with the ICT services provider make every reasonable endeavour to ensure the following protections are in place in regard to electronically stored personal data:

- That operating systems are capable of supporting updates and are updated accordingly
- That malware and virus protections are kept up to date and compatible with operating systems
- That there is an efficient and effective data back-up and recovery system.

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
- Critical Incident Policy
- Attendance Policy

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.

Data Processors

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). St. Brigid's GNS 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.

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.

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

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

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:

Name	Responsibility
Board of Management:	Data Controller
Principal:	Implementation of Policy

MONITORING THE IMPLEMENTATION OF THE POLICY

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

Reviewing and evaluating the policy

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

RATIFICATION & COMMUNICATION

Ratified at the BoM meeting on the 17th January 2019 and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting.

Appendix 1.



Information note for Parents on the Primary Online Database.

Dear Parent/Guardian,

As you may be aware, the Department of Education and Skills is currently developing an individualised database of primary school children, called the Primary Online Database (POD).

Individualised data coverage has already been in place for a number of years at pre-primary, post-primary and third level education, and is an extremely valuable resource in monitoring the progress of all students through the education system, including vulnerable subgroups, developing education policy, forward planning, and underpinning payments and teacher allocations to education institutions. The new system at primary level will allow the Department to identify children leaving the education system early or not making the transfer from primary to post primary level. It also will in time deliver benefits to schools and parents by reducing form filling and allowing records to be transferred between schools automatically as your child moves school.

The Department is now in the process of rolling out and populating POD across all primary schools. This means that schools are now being asked to provide individual details about your child, including your child's PPS number, name, address, date of birth and nationality, into the POD system. A full outline of all of the data requested, the reasons for collecting each piece of data, and how the data will be used, accessed, stored, shared and retained is given in the POD Fair Processing Notice available on the "POD" area of the Department's website www.education.ie or on request from Statistics section. A Frequently Asked Questions document is also available on the website which outlines answers to some of the regular queries from parents we have received to date.

The Department takes the protection of your child's data very seriously. All data on POD is stored on the Revenue Commissioners servers, with the same security protections in place as for Revenue records. Within the Department, only a limited number of Statistics section staff will have access to the individual records. Two optional pieces of information requested about your child, religion and ethnic or cultural background, are considered under Data Protection legislation to be sensitive personal data and require your written consent in order for the data to be transferred to the Department. The current retention policy for POD data is for POD records to be maintained until the pupil reaches the age of 30. This is to allow longitudinal analysis in line with the national and international priorities for lifelong learning, and to allow for pupils to obtain their record from the Department in the future.

A POD helpdesk is in place to answer queries and provide any further information you may require, and is staffed from Monday to Friday 8:30am to 5pm. The helpdesk staff can be contacted by email at pod@education.gov.ie or at 01 8892311.

Best regards,
Diarmuid Reidy, Senior Statistician
Statistics Section
Department of Education and Skills

Appendix 2.

St. Brigid's Girls' National School

Palmerstown, Dublin 20.

Dear Parents/Guardians,

The Department has developed an electronic individualised database of primary school pupils, called the Primary Online Database (POD). A full outline of all of the data requested, the reasons for collecting each piece of data, and how the data will be used, accessed, stored, shared and retained is given in the POD Fair Processing Notice available on the "POD" area of the Department's website www.education.ie or on request from Statistics section. A Frequently Asked Questions document is also available on the website which outlines answers to some of the regular queries from parents that the Department has received to date. Please refer to Appendix 1 for the full text of the Department's specimen letter to parents/guardians.

The Department has indicated that in the longer term it is proposed that POD will also share data with the Department of Social Protection, the HSE and the NCSE, and other bodies, eliminating the need for many of the current data requests to schools from these bodies, for example in relation to vaccination programmes, child benefit claims, application for special educational needs.

There are three categories of pupil data which will be shared by schools with the Department of Education and Skills. Category 1 information covers data that is required to validate the pupil's identity. This information will be transferred to the PPSN validation service of the Department of Expenditure and Reform or the Department of Social Protection for validation purposes only.

Category 1 information also covers pupil level data which is necessary for policy and planning purposes within the Department of Education and Skills. A full listing of the variables collected along with the purpose for each piece of information can be found in Appendix A of circular 0017/2014 available at www.education.ie or a hardcopy of DES circular 0017/2014 is available on request from the school office.

Category 2 covers sensitive personal data which the Department asks primary schools to furnish, and which requires your written consent for your child's school to record this information and for the school to forward this information to the Department for the purposes as outlined in circular 0017/2014 a copy of which is available at www.education.ie or on request from your child's school. Your consent is also required for this information to be forwarded to any other primary school your child may transfer to during their time in primary school.

Category 3 data is information which is required at school level only and will not be accessible to the Department of Education and Skills. This data will be kept on your child's POD record for the duration of their primary schooling and for two years afterwards.

Please note that the reference to "you" in this consent form means a parent or a guardian of a pupil, or a pupil aged 18 years and over who is attending a recognized primary school.

Yours sincerely,

Mrs Aideen O'Shea, Principal.

Date: _____