DATA PROTECTION POLICY

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Introductory Statement

This policy has been formulated in consultation with the staff, parents and Board of Management in 2018 in order to comply with the EU General Data Protection Regulation (GDPR).

The school's Data Protection Policy applies to the ***personal data*** held by the school's Board of Management (Board of Management), which is protected by the Data Protection Acts 1988 to 2018 and the EU General Data Protection Regulation (GDPR)

The policy applies to all school staff, the Board of Management, parents/guardians, pupils and others (including prospective or potential pupils 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 Patrick's Boys' N.S. operates a "***Privacy by Design***" method in relation to Data Protection. This means we plan carefully when gathering personal data so that we build in the ***data protection principles*** as integral elements of all data operations in advance. We audit the personal data we hold in order to

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

Data Protection Principles

The school Board of Management is a *data controller* of *personal data* relating to its past, present and future staff, pupils, parents/guardians and other members of the school community. As such, the Board of Management 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 pupils 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 pupils, etc.), the information is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with the School. All such data

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

2. 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.
The GDPR also requires that the information be provided in concise, easy to understand and clear language.
Consent requires some form of clear affirmative action.
Silence or pre-ticked boxes will no longer be sufficient to constitute consent.
The GDPR permits data subjects to withdraw their consent at any time

3. Keep it only for one or more specified and explicit lawful purposes

The Board of Management 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 genuine reason for doing so may gain access to the information. Personal Data is securely stored under lock and key in the case of manual records and protected with computer software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) are encrypted and password-protected

6. Keep Personal Data accurate, complete and up-to-date

Pupils, 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. Please see Detailed record Retention Table in Appendix 1. Summary **School Record Retention** Table, is as follows:

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 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
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

Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?

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.

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

Scope

The Data Protection legislation applies to the keeping and processing of *Personal Data*. The purpose of this policy is to assist the school to meet its statutory obligations, to explain those obligations to School staff, and to inform staff, pupils and their parents/guardians how their data will be treated

The policy applies to all school staff, the Board of Management, parents/guardians, pupils and others (including prospective or potential pupils 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 (Board of Management)

Data Controller is the Board of Management of the school

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

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data
- Retrieving, consulting or using the data
- Disclosing the data by transmitting, disseminating or otherwise making it available
- Aligning, combining, blocking, erasing or destroying the data

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection legislation places responsibilities on such entities in relation to their processing of the data. Data Processors that are used by the school are: Aladdin and the Primary Online Database (POD). Please see:

- Aladdin Privacy Statement…Appendix 3
- POD Privacy Statement…….Appendix 4

Special categories of Personal Data refers to *Personal Data* regarding a person's

- racial or ethnic origin

- political opinions or religious or philosophical beliefs
- physical or mental health
- sexual life and sexual orientation
- genetic and biometric data
- criminal convictions or the alleged commission of an offence
- trade union membership

Personal Data Breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. This means any compromise or loss of personal data, no matter how or where it occurs

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 pupils attending the School

Under S***ection 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 Patrick's Boys' N.S. 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 Patrick's Boys' N.S. 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 pupils 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 Board of Management 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 Patrick's Boys' N.S. seeks to:

- enable pupils 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 pupils, 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 Patrick's Boys' N.S.:*

a. Manual records are kept in a secure, locked filing cabinet in a locked administration office only accessible to personnel who are authorised to use the data. Employees are required to maintain the confidentiality of any data to which they have access.
b. Digital records are stored on password-protected computer with adequate encryption and firewall software in a locked office. The school has the burglar alarm activated during out-of-school hours.

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 pupils (including at school events and noting achievements) are managed in line with the accompanying policy on school photography (See Appendix 5).
- 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.

b) *Purposes: The purposes for keeping student records include:*

- to enable each student to develop to his/her full potential
- to comply with legislative or administrative requirements
- to ensure that eligible pupils 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 pupils 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 'Photograph and Video Policy (Appendix 5)' and 'School Website Privacy Statement (Appendix 6)'.
- to ensure that the student meets the school's admission criteria

- to ensure that pupils 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.
- Note: The school does not retain incidental notes, e.g. school Tour Permission Slips.

c) *(Location and Security procedures as in part 1 c above)*

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)*

4. Other Records: Creditors

a) *Categories of Creditors 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 in part 1 c above)*

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 donor 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 in part 1 c above)

CCTV IMAGES/RECORDINGS-

CCTV is installed in St Patrick's Boys' N.S.
Cameras are installed both externally and internally in various locations, as detailed in school CCTV Policy.
These CCTV systems may record images of staff, pupils and members of the public who visit the premises.

Purposes:
Safety and security of staff, pupils and visitors and to safeguard school property and equipment.

Security:
Access to images/recordings is restricted to the Principal and Deputy Principal of the school. Recordings are retained for 28 days, except if required for the investigation of an incident. Images/recordings may be viewed or made available to An Garda Síochána pursuant to Data Protection Acts legislation.

EXAMINATION RESULTS

The school will hold data comprising examination results in respect of its pupils. These include class, 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 pupil'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
As above

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 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
- Internet Safety: Acceptable Usage Policy
- Assessment Policy
- Special Educational Needs Policy
- Library Policy
- Book-Rental Policy
- Critical Incident Policy
- Student Council 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 (i.e. Written Third Party Service Agreement) St Patrick's Boys' N.S. third party agreement (Appendix 2) specifies the conditions under which the data may be processed, the security conditions attached 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 Board of Management 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 (Board of Management) without undue delay.

Dealing with a data access request

Individuals are entitled to a copy of their personal data on written request (See Appendix 7)
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 the caller to put their request in writing
- Refer the request to the Principal for assistance in difficult situations
- Not feel forced into disclosing personal information

COMMUNICATING WITH PARENTS DURING DISTANCE LEARNING

When emailing parents in bulk, use the 'bcc', blind carbon copy facility to protect parents' personal data.

- Only communicate with parents' emails. Sending/receiving emails from pupils is prohibited.
- Use approved platforms to communicate with parents e.g. Class Dojo, Zoom, Google Classroom, Study Ladder, email.
    - Refer to our Internet Safety: Acceptable Usage Policy for more information on using Zoom to hold video meets with pupils.
- Where staff are making phone contact with parents, their number should be placed on 'private.'

Implementation arrangements, roles and responsibilities

The Board of Management 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, St Patrick's Boys' N.S	Data Controller
Principal	Implementation of Policy

For further information on individual roles, click on the following links.
Board of Management
Principal/Deputy Principal
Teaching Staff
School Administrative Staff
SNAs
Caretakers

Links

wwww.dataprotection.ie
https://gdpr4schools.ie/

Ratification & communication

Ratified at the Board of Management meeting on 17/11/2020 and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting.

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 annually. 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, pupils, 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

Signed:

For and behalf of Board of Management

_____*(Chairperson Board of Management)*

Date: Ratified: _____

APPENDIX 1
Detailed Records Retention Schedule

(ex. www.dataprotectionschools.ie)

St Patrick's Boys' N.S.

Retention of Records

Schools as *data controllers* must be clear about the length of time for which personal data will be kept and the reasons why the information is being retained. In determining appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the data must be deleted or disposed of in a secure manner. It may also be anonymised to remove any personal data. Anonymisation must be irrevocable; removing names and addresses may not necessarily be sufficient.

In order to comply with this legal requirement, ***St Patrick's Boys' N.S.*** > has assigned specific responsibility and introduced procedures for ensuring that files are purged regularly and securely and that personal data is not retained any longer than is necessary. All records will be periodically reviewed in light of experience and any legal or other relevant indications.

IMPORTANT: In all cases, schools should be aware that where proceedings have been initiated, are in progress, or are reasonably foreseeable (although have not yet been taken against the school/board of management/an officer or employee of the school (which may include a volunteer)), all records relating to the individuals and incidents concerned should be preserved and should under no circumstances be deleted, destroyed or purged. The records may be of great assistance to the school in defending claims made in later years.

WARNING: In general, the limitation period does not begin to run until the person concerned acquires knowledge of the facts giving rise to the claim and the Statue of Limitations may be different in every case. In all cases where reference is made to "18 years" being the date upon which the relevant period set out in the Statute of Limitations commences for the purposes of litigation, the school must be aware that in some situations (such as the case of a student with special educational needs, or where the claim relates to child sexual abuse, or where the student has not become aware of the damage which they have suffered, and in some other circumstances), the Statute of Limitations **may not begin to run when the student reaches 18 years of age and specific legal advice should be sought by schools on a case-by-case basis.** In all cases where retention periods have been recommended with reference to the relevant statutory period in which an individual can make a claim, these time-frames may not apply where there has been misrepresentation, deception or fraud on the part of the respondent/defendant. In such a circumstance, the school should be aware that the claim could arise many years after the incident complained of and the courts/tribunals/employment fora may not consider the complainant to be "out of time" to make their claim.

Student Records	Primary	Vol Sec.	C&C	ETB	Final disposition	Comments
Registers/Roll books	Indefinitely	Indefinitely	Indefinitely	Indefinitely	N/A	Indefinitely. Archive when class leaves + 2 years
State exam results	N/A	N/A	N/A	N/A	N/A	SEC responsibility to retain, not a requirement for school/ETB to retain.

Records relating to pupils/students	Primary	Vol.Sec	C&C	ETB	Confidential shredding	Comments
Enrolment Forms	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Student transfer forms (Applies from primary to primary; from one second-level school to another)	If a form is used- Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Disciplinary notes	Never destroy	Never destroy	Never destroy	Never destroy	N/A	Never destroy
Results of in-school tests/exams (i.e. end of term, end of	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for

year exams, assessment results)						proceedings to be served on the school).
End of term/year reports	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of school tours/trips, including permission slips, itinerary reports	Never destroy	Never destroy	Never destroy	Never destroy	N/A	Never destroy
Scholarship applications e.g. Gaeltacht, book rental scheme	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Garda vetting form & outcome - **STUDENTS**	N/A **as primary schools pupils will not be undergoing vetting**	Record of outcome retained for 12 months.	Record of outcome retained for 12 months.	Record of outcome retained for 12 months.	Confidential shredding	Record of outcome retained for 12 months. School to retain the reference number and date of disclosure on file, which can be checked with An Garda Siochana in the future.

Sensitive Personal Data Students	Primary	Vol Sec.	C&C	ETB	Final disposition	Comments
Psychological assessments	Indefinitely	Indefinitely	Indefinitely	Indefinitely	N/A - Never destroy	Never destroy
Special Education Needs' files, reviews, correspondence and Individual Education Plans	Indefinitely	Indefinitely	Indefinitely	Indefinitely	N/A	Never destroy
Accident reports	Indefinitely	Indefinitely	Indefinitely	Indefinitely	N/A	Never destroy
Child protection records	Indefinitely	Indefinitely	Indefinitely	Indefinitely	N/A	Never destroy
Section 29 appeal records	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Enrolment/transfer forms where child is not enrolled or refused enrolment	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of complaints made by parents/ guardians	Depends entirely on the nature of the complaint.	Depends entirely on the nature of the complaint.	Depends entirely on the nature of the complaint.	Depends entirely on the nature of the complaint.	Confidential shredding or N/A, depending on the nature of the records.	Depends entirely on the nature of the complaint. If it is child-safeguarding, a complaint relating to teacher-handling, or an accident, then

						retain indefinitely. Never destroy. If it is a complaint of a more mundane nature (e.g. misspelling of child's name, parent not being contacted to be informed of parent-teacher meeting) or other minor matter, then student reaching 18 years + 7 years (6 years in which to take a claim, and 1 year for proceedings to be served on school)

Staff Records	Primary	Vol Sec.	C&C	ETB	Final disposition	Comments
Recruitment process Note: these suggested retention periods apply to unsuccessful candidates only. They do NOT apply to successful candidates, or candidates who are/were also employees already within your school applying for another post/position. For successful candidates, or candidates who are/were also employees already within your school applying for another post/position, see retention periods set out below.	✔	✔	✔	✔ **Note:** Recruitment and employment records are held at ETB Head Office in the HR and Finance Depts**.**	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Applications & CVs of candidates called for interview	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Database of applications	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Selection criteria	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Applications of candidates not shortlisted	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Unsolicited applications for jobs	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Candidates shortlisted but unsuccessful at interview	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Candidates shortlisted and are successful but do not accept offer	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Interview board marking scheme & board notes	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Panel recommendation by interview board	✔	✔	✔	✔	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Staff personnel files (whilst in employment)	**Primary**	**Vol.Sec**	**C&C**	**ETB**	**Final Disposition**	**Comments**
e.g. applications, qualifications, references, recruitment, job specification, contract, Teaching Council registration, records of staff training etc.				Note: records & personnel files retained at ETB head office level	Confidential shredding. Retain an anonymised sample for archival purposes.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Application &/CV	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Qualifications	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7

						years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
References	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview: database of applications (the section which relates to the employee only)	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Selection criteria	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview board marking scheme & board notes	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

Panel recommendation by interview board	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Recruitment medical	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Job specification/ description	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Contract/Conditions of employment	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Probation letters/forms	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school,

						plus 1 year for proceedings to be served on the school)
POR applications and correspondence (whether successful or not)	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Leave of absence applications				Records & personnel files retained at ETB head office level	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Job share	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Career Break	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for

						proceedings to be served on the school)
Maternity leave	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Paternity leave	✔	✔	✔	✔	Confidential shredding	Retain for 2 years following retirement/resignation or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater).
Parental leave	✔	✔	✔	✔	Confidential shredding	Must be kept for 8 years - Parental Leave Act 1998 Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be

						served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years.
Force Majeure leave	✔	✔	✔	✔	Confidential shredding	Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years.
Carers leave	✔	✔	✔	✔	Confidential shredding	Must be kept for 8 years - Carer's Leave Act 2001 Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years

Working Time Act (attendance hours, holidays, breaks)	✔	✔	✔	✔	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school). There is a statutory requirement to retain for 3 years
Allegations/complaints	✔	✔	✔	✔	ETB one doesn't have a time period advised	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). **Please note** the relevant DES Circular re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.
Grievance and Disciplinary records	✔	✔	✔	✔		Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). **Please note** the relevant DES Circular re

						Disciplinary Procedures in relation to the period of time for which a warning remains “active” on an employee’s record.

Occupational Health Records	Primary	Vol Sec.	C&C	ETB	**Confidential Shredding**	**Comments**
Sickness absence records/certificates	✔	✔	✔	Retain on staff personnel file at ETB HO	Confidential shredding Or do not destroy.	Re sick leave scheme (1 in 4 rule) ref DES C/L 0060/2010 Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Pre-employment medical assessment	✔	✔	✔	✔	Confidential shredding Or do not destroy?	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be

						served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.
Occupational health referral	✔	✔	✔	✔	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.
Correspondence re retirement on ill-health grounds	✔	✔	✔	✔	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness

						absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.
Accident/injury at work reports	✔	✔	✔	✔	Confidential shredding	Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy).
Medical assessments or referrals	✔	✔	✔	✔	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be

						served on the school), unless Medmark assessment relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.
Sick leave records (sick benefit forms)	✔	✔	✔	✔	Confidential shredding	In case of audit/refunds, Current year plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

Superannuation /Pension /Retirement records	**Primary**	**Vol Sec.**	**C&C**	**ETB**	**Final Disposition**	**Comments**
Records of previous service (incl. correspondence with previous employers)	✔	✔	✔	Superannuation records are held at ETB head office in the HR and	N/A	DES advise that these should be kept indefinitely.

				Finance Depts.		
Pension calculation	✔	✔	✔	✔	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)
Pension increases (notification to Co. Co.)	✔	✔	✔	✔	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for

						proceedings to be served on the school) (whichever is the longer)
Salary claim forms	✔	✔	✔	✔	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)

Government returns	Primary	Vol Sec.	C&C	ETB	Final disposition	Comments
Any returns which identify individual staff/pupils,				Submitted online to DES. Printout retained by ETB HO	N/A	**Depends upon the nature of the return. If it relates to pay/pension/benefits of staff, keep indefinitely as per DES guidelines. If it relates to information on students, e.g. October Returns, Annual Census etc., keep in line with "Student Records" guidelines above.**

Board of Management Records	Primary	Vol Sec.	C&C	ETB	Final disposition	Comments
Board agenda and minutes	✔	✔	✔	Sent to ETB for approval	N/A	Indefinitely. These should be stored securely on school property
School closure	✔	✔	✔	✔		On school closure, records should be transferred as per Records Retention in the event of school closure/amalgamation. A decommissioning exercise should take place with respect to archiving and recording data.
Other school based reports/minutes	**Primary**	**Vol Sec.**	**C&C**	**ETB**	**Final disposition**	**Comments**
CCTV recordings	✔	✔	✔	✔	Safe/secure deletion.	28 days in the normal course, but longer on a case-by-case basis e.g. where recordings/images are requested by An Garda Síochána as part of an investigation or where the records /images capture issues such as damage/vandalism to school property and

						where the images/recordings are retained to investigate those issues.
Principal's monthly report including staff absences	✔	✔	✔	Submitted to ETB HO	N/A	Indefinitely. Administrative log and does not relate to any one employee in particular: the monthly reports are not structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible. Not a "relevant filing system".
Financial Records	**Primary**	**Vol Sec.**	**C&C**	**ETB**	**Final disposition**	**Comments**
Audited Accounts	✔	✔	✔	Retained ETB head office	n/a	Indefinitely
Payroll and taxation	✔	✔	✔	Retained ETB head office		Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made

						available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained **indefinitely** within the school. These records can be kept either on a manual or computer system.
Invoices/back-up records/receipts	✔	✔	✔	✔	✔	Retain for 7 years

Promotion process	Primary	Vol Sec.	C&C	ETB Employment records are held at ETB head office in the HR and Finance Depts.	**Final Disposition**	**Comments**
Posts of Responsibility	✔	✔	✔		N/A	**Retain indefinitely on master file as it relates to pay/pension etc. (See DES guidelines)**
Calculation of service	✔	✔	✔		N/A	Retain indefinitely on master file
Promotions/POR Board master files	✔	✔	✔		N/A	Retain indefinitely on master file
Promotions/POR Boards assessment report files	✔	✔	✔		N/A	Retain original on personnel file in line with retention periods in "Staff Records" retention guidelines above
POR appeal documents	✔	✔	✔		N/A	Retain original on personnel file, and copy of master & appeal file. Retain for duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school). Copy on master and appeal file.

Correspondence from candidates re feedback	✔	✔	✔		N/A	Depends upon nature of feedback. If feedback is from unsuccessful candidate who is not an employee within the school, keep in line with retention periods in "Staff Records" above. If feedback is from successful candidate or from unsuccessful candidate who is already an employee within the school, keep in line with "Staff personnel while in employment" above.

APPENDIX 2

Written third party service agreement

In accordance with the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (GDPR), the Board of Management of St Patrick's Boys' National School requires this written third party service agreement to be in place with all our data processors

The GDPR requires that the Board of Management shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of GDPR and thus ensure the protection of the rights of the data subject

The Board of Management of St Patrick's Boys' N.S as data controller imposes the following minimum obligations on you as data processor:

1. To act only on the documented instructions of the data controller i.e. the Board of Management of St Patrick's Boys' N.S with regard to the subject-matter, the types of personal data processed, the documented purposes of the processing and the duration of the processing

2. To comply with the obligations imposed on data controllers by the Data Protection Acts 1988 to 2018 and the GDPR in order to ensure that appropriate steps are taken to ensure the confidentiality of the personal data being processed and to guard against the accidental destruction, damage or loss of personal data

3. To provide sufficient guarantees in respect of technical security measures and organisational measures governing the processing of the school's data

4. To provides an indemnity to the school Board of Management for any breaches of the above legal conditions

5. To commit to the provision of assistance where appropriate to enable the school Board to comply with a data subject access request

6. To immediately contact the school principal Anthony Liddane, St Patrick's Boys' N.S, Dublin Road, Limerick, Phone No. 061412913, where there are any data security breaches in the data processor's company in order to facilitate the school BoM, as data controller, to take the required action in accordance with the GDPR regarding the data breach.
7. To comply with the requirements of the Data Protection Policy of St Patrick's Boys' N.S attached hereto.

8. On termination of the contract between the data processor and the Board of Management of St Patrick's Boys' N.S, all personal data held by the data processor must be returned to the Board as data controller or in the alternative, it must be entirely deleted from the data processor's systems and files

9. To make available to the controller (Board of Management) all information necessary to demonstrate compliance with the obligations of the GDPR and to allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller

10. If the processor believes that any instruction it receives from the controller is in breach of the GDPR, the processor shall immediately inform the controller

APPENDIX 3

ALADDIN PRIVACY STATEMENT

1. INTRODUCTION
2. WHO ARE WE?
3. WHO DOES THIS PRIVACY STATEMENT APPLY TO?
4. WHAT INFORMATION DO WE COLLECT FROM YOU?
5. WHAT DO WE DO WITH YOUR INFORMATION?
6. DISCLOSURE OF YOUR INFORMATION
7. SAFE-GUARDING YOUR PERSONAL DATA
8. COOKIES
9. YOUR RIGHTS
10. ACCESS TO INFORMATION
11. DISCLAIMER
12. RETENTION OF INFORMATION
13. HOW TO CONTACT US

1. INTRODUCTION

This Privacy Statement (together with Our terms of use available at https://www.aladdin.ie/content/terms (the **"Terms of Use"**)) sets out the basis on which any personal data We collect from You, or that You provide to Us, will be processed by Us. Please read the following carefully to understand Our views and practices regarding the personal data We collect and how We will treat it. By visiting https://www.aladdin.ie/ (**"Our Site"**) contacting Us and/or using the Aladdin software (**"Our Services"**) You are accepting and consenting to the practices described in this Privacy Statement.

We may update this Privacy Statement from time to time and will post any changes on Our Site so it might be a good idea to come back and read through it again, from time to time. This Privacy Statement was last updated in April 2018

2. WHO ARE WE?

Any reference to **"We", "Us"** and **"Our"** is to Cloudware Limited t/a Aladdin Schools, with registered address at Aladdin, First Floor, Block 1, Deansgrange Business Park, Co. Dublin, Ireland.

For the purpose of the Data Protection Act 1988 & 2003 (the **"Act"**), in providing Our Services, We act as data processors who process information on behalf of primary schools (the **"School"**) who are the data controllers for the purposes of the Act. The School allows Us to process Your information in connection with the School's use of Our Services. It is the responsibility of the School to determine how Your information is processed by Us and We will follow the School's instructions at all times. You should refer to the privacy statement of the School for further information as the School determines the purpose for which Your information will be processed in connection with Our Services.

3. WHO DOES THIS PRIVACY STATEMENT APPLY TO?

This Privacy Statement applies to any person whose information we process on behalf of the School and who would be considered a data subject for the purposes of the Act. References to **"You"** and **"Your"** shall include School staff (both current and past), School pupils (both current and past) and their family, applicants for placement at the School and parents/guardians of children.

4. WHAT INFORMATION DO WE COLLECT FROM YOU?

The information that We collect about You includes:

1. GENERAL DATA – This is information that You may give Us or the School by correspondence by phone, e-mail or otherwise. This includes information You provide when You use Our Site, Our Services and when You report a problem or receive support services in connection with Our Site and/or Our Services. The information You give Us may include but is not limited to the following information that We process on behalf of Schools:
    - your name, address, email address and phone number;
    - information relating to staff and teachers who use Our Site and/or Our Services including (but not limited to) their name, address, email address and phone number;
    - information relating to children who are connected with the School, including (but not limited to), name, address, contact information (including emergency contacts), date of birth, ethnic origin, religion, nationality, photographs, medical information, family history, performance, evaluation, punctuality and attendance information; and
    - information relating to parents or guardians of those children including (but not limited to) their name, address, contact information, and ethnic origin.
2. TECHNICAL DATA - We may collect the following technical information on behalf of Schools:
    - technical information, including the Internet protocol (IP) address used to connect Your device to the Internet, Your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
    - information about Your visit to Our Site or use of Our Services, including the full Uniform Resource Locators (URL) clickstream to, through and from Our Site and Our Services (including date and time log); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call Our customer service number.

5. WHAT DO WE DO WITH YOUR INFORMATION?

We may use the information collected in the following ways:

1. GENERAL DATA - We will use this information on behalf of the School to:
    - carry out Our obligations arising from any contracts entered into between Us and the School, including the Terms of Use, and to provide the products and services requested from Us;
    - send communications to You about Our Site and/or Our Services including by SMS and push notification. We cannot guarantee that You will receive all communications from Us and We shall not be liable in the event that You do not receive such communications. You can opt out of receiving such communications by contacting us using the details below;
    - make notifications about changes to Our Services; and
    - ensure that content from Our Site is presented in the most effective manner.

If any sensitive personal data is collected (i.e. data relating to racial or ethnic origin, political or religious opinions, membership of a trade union, physical or mental health or condition or sexual life, the commission of any offence or related documentation) then You consent to Our processing this data in the manner set out in this Privacy Statement for and on behalf of the School. We do not control nor do We have any input into the content and information submitted to Our Site and Our Services, the

School is responsible for ensuring that all appropriate consents are in place to allow Us to process the information on the Schools behalf.

2. TECHNICAL DATA - We will use this information on behalf of the School to:
    - administer Our Site and Our Services and for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - provide information to Schools;
    - to improve Our Site and Our Services and to ensure that content is presented in the most effective manner for You and for Your device;
    - to allow You to participate in the interactive features of Our Service, when You choose to do so; and
    - as part of Our efforts to keep Our Services and Our Site safe and secure.

6. DISCLOSURE OF YOUR INFORMATION

We may share Your personal information with any member of Our group, which means Our affiliates and subsidiaries, Our ultimate holding company and its subsidiaries, as defined in the Companies Act (Ireland) 2014.

We will take every care to protect Your information and use it in accordance with the Schools instructions. In certain circumstances We may disclose it to certain third parties as follows:

- the School;
- business partners and sub-contractors for the performance of any contract We enter into with them in connection with Our Site and Our Services including; payment processors and hosting service providers;
- at the Schools request, We may disclose the information or receive information about You with government departments including with respect to the Primary Online Database run by the Department of Education and Skills;
- We may disclose the information relevant to any backup or hosting services to Google Inc. You can read more about the measures taken by Google to protect the security of their services and the information at: https://cloud.google.com/security/compliance.
- analytics and search engine providers that assist Us in the improvement and optimisation of Our Site. This consists of aggregated anonymous information only and relates to the web pages visited on Our Site and not the information included on those web pages;
- if We or substantially all of Our assets are acquired by a third party, in which case personal data held by Us will be one of the transferred assets;
- if We are under a duty to disclose or share Your personal data in order to comply with any legal obligation, or in order to enforce or apply the Terms of Use and other agreements; and/or
- to protect Our rights, property, or safety, or that of the School, You or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

7. SAFE GUARDING YOUR PERSONAL DATA

The information processed by Us, on behalf of the School, may be transferred to, and stored at Our hosting centres in the European Union. By submitting Your personal data, You and the School agree to

this transfer, storing or processing. We will take all steps reasonably necessary to ensure that the information is treated securely, in compliance with the instructions of the School and in accordance with this Privacy Statement and the relevant law. In particular, We have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information We manage on behalf of Schools and the information We collect and manage on their behalf.

All information processed by Us is stored on Google's secure servers. To protect the privacy and security of Our Services, We will also take reasonable steps to verify Your identity before granting access to information. We also use secure connections to protect sensitive information during its transmission. Where You have been given (or where You have chosen) a password which enables You to access Our Services, You are responsible for keeping this password confidential. We ask You not to share Your password with anyone.

You should be aware that when You disclose personal information that information is available to the School and may be used by the School. Schools are solely responsible for the uses made of Your information and We have no responsibility for the actions of the Schools in this regard.

You should contact the School in the event that Your information needs to be updated or changed, for example in the event that Your contact details have changed. We shall not be responsible for any failure of the School to contact You, including where You have not provided the correct contact details.

If You have provided information to the School You understand that We process that information as an agent of the School. We may hold a back-up copy of the information that You submit, but only on behalf of the School. If You wish to modify or otherwise deal with Your personal information submitted directly to Us then You should contact the School directly, as they have responsibility for that personal information. We will comply with the School's instructions in respect of that personal information. If You wish to understand the School's data protection or privacy statement with regards to the dealings that it has with Your personal information then You should contact the School directly to establish such terms.

Although We will do Our best to protect Your personal data, We cannot guarantee the security of Your data transmitted to Our Site; any transmission is at Your own risk. Once We have received Your information, We will use strict procedures and security features to try to prevent unauthorised access.

8. COOKIES

Our Site uses cookies to distinguish You from other users of Our Site. This helps Us to provide You with a good experience when You browse Our Site and also allows Us to improve Our Site. For detailed information on the cookies We use and the purposes for which We use them see Our Cookie policy https://www.aladdin.ie/cookies.html.

You can set Your browser not to accept cookies. If You go to https://www.aladdin.ie/cookies.html it will tell You how to remove cookies from Your browser. However in a few cases some of the features of Our Site may not function as a result.

9. YOUR RIGHTS

Our site may, from time to time, contain links to and from third party websites including the website of the School. If You follow a link to any of these websites, please note that these websites have their own privacy statements and that We do not accept any responsibility or liability for these third party websites. Please undertake the appropriate due diligence before submitting any personal data to these websites.

10. ACCESS TO INFORMATION

The Act gives You the right to access information held about You by the School. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee determined by the School to meet the costs in providing You with the information held about You. You should contact the School directly in connection with any such access request.

You have a right to have Your information rectified or erased free of charge if it is inaccurate or no longer required by Us or the School for the purpose for which it was collected. You can do this by contacting the School directly.

11. DISCLAIMER

WE ARE NOT LIABLE TO YOU OR THE SCHOOL IN RESPECT OF ANY CLAIMS, LOSSES, DAMAGES, EXPENSES (INCLUDING REASONABLE LEGAL FEES) ARISING OUT OF OR IN CONNECTION WITH THE USE AND/OR DISCLOSURE OR DISSEMINATION OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY STATEMENT.

12. RETENTION OF INFORMATION

We will retain Your information for as long as We are directed by the School or for as long as We are required under relevant laws.

If You would like Us to delete your information, please contact the School directly with Your request.

13. HOW TO CONTACT US

Please contact Us if You have any questions about Our Privacy Statement or information We hold about You:

- by email at: dpo@aladdin.ie
- or write to Us at: DPO, Aladdin, Block 1, Deansgrange Business Park, Co. Dublin, Ireland.

This privacy statement was last updated on 25th April 2018

APPENDIX 4

Department of Education & Skills

POD Privacy Statement

GDPR and Data Protection- Privacy Statement

The General Data Protection Regulation (the GDPR) comes into effect on the 25th May 2018. The GDPR applies across the European Union and aims to give individuals more rights, control and understanding of how their personal data is processed.

Under GDPR the Department of Education and Skills are required to keep you informed of the types of data we hold on you and your child, the purpose it is used for, and your rights in relation to how it is processed.

The Department of Education and Skills, which provides for the education and training of people resident in the State, requires certain personal data on all learners in order to fulfil its function. For primary school pupils, this data is held on the Primary Online Database (POD). The data held on POD forms the basis of the allocation of resources to schools as well as statistical reporting on education; it is also used for research and analysis into the operation of the education system and the formation of future policies. Data is shared with the Department of Employment Affairs and Social Protection for validation purposes, and with the Central Statistics Office under Section 31 of the Statistical Act for statistical reporting and analysis.

The complete Privacy Notice, which outlines further information in relation to the data held by the Department, can be found on the Department's website at the link below, as can full details of the Department's data protection policy setting out how the Department will use your child's data, as well as information regarding your child's rights as a data subject. https://www.education.ie/en/The-Department/Data-Protection/.

If you have any further queries in relation to POD or the data held therein, the POD Helpdesk can be reached at 01 889 2311 or pod@education.gov.ie

APPENDIX 5

Photograph and Video Policy

1. Permission to be signed in registration form by parents at the beginning of each year asking permission for photographs to be taken for school projects, competitions and displays.
2. Internet- children to appear in groups and no names to be published.
3. All photos to be filed away in an album and digital photos to be put on teacher's server.
4. From time to time, we publish photographs of pupils who are engaged in school related activities in local newspapers or on the school website, Class Dojo or school Facebook account or on the school corridor display boards, etc. The children are usually photographed in groups. Videos of children involved in concerts, plays, etc. may also be published.
5. School calendar- An annual school calendar is published every year which contains each class

a) *The school undertakes to seek parents' or guardians' permission for the use of photographs of pupils to extend to all school occasions and events, e.g. calendar, concerts, newspapers, school website.*
b) *If permission is not granted, it is the parent's responsibility to ensure that his/her child is excluded from the photograph.*
c) *At school ceremonies and other public events, the school will publicly announce the use of photographic and audio visual equipment so that anyone who would rather not be photographed or videoed can remove themselves.*
d) *Only images of pupils in appropriate dress will be used.*
e) *Inappropriate use of images of pupils will be brought to the attention of the Designated Liaison Person.*

Implementation and Review
This Policy will be reviewed, as deemed necessary, by the Board of Management, Principal, and Staff of the school.

APPENDIX 6

St Patrick's Boys' N.S.
School Website Privacy Statement

St Patrick's Boys' N.S. PRIVACY STATEMENT

Website of ST PATRICK'S BOYS' N.S. :

St Patrick's Boys' N.S. is committed to preserving the privacy of all visitors to www.St Patrick's Boys'ns.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. St Patrick's Boys' N.S. 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, and
- 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. St Patrick's Boys' N.S. 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 St Patrick's Boys' N.S. 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 personalised

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 St Patrick's Boys' N.S. at Dublin Road, Limerick. 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 St Patrick's Boys' N.S. 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. Your 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,
St Patrick's Boys' N.S. ,
Dublin Road,
Limerick

or by email to: principal@stpatricksboysns.com

APPENDIX 7

PERSONAL DATA ACCESS REQUEST FORM

St Patrick's Boys' N.S.

Request for a copy of Personal Data under the Data Protection Acts 1988 to 2018

Important: Proof of Identity must accompany this Access Request Form (eg. official/State photographic identity document such as driver's licence, passport).

Full Name:	
Maiden Name *(if name used during* your school duration*)*	
Address:	
Contact number *	Email addresses *

* We may need to contact you to discuss your access request

Please tick the box which applies to you:

Parent/ Guardian of current Pupil	**Former Pupil**	**Current Staff Member**	**Former Staff Member:**
☐	☐	☐	☐

Name of Pupil:		Date of Birth of Pupil:	
Insert Year of leaving:		Insert Years From/To:	

DATA ACCESS REQUEST:

I, …… [name] wish to make an Access Request for a copy of personal data that St Patrick's Boys' National School holds about me/my child. I am making this access request under Data Protection Acts 2013 to 2018

To help us to locate your personal data, please provide details below, which will assist us to meet your requirements e.g. description of the category of data you seek

Any other information relevant to your access request (e.g. if requesting images/recordings made by CCTV, please state the date, time and location of the images/recordings as otherwise it may be very difficult or impossible for the school to locate the data)

This **Access Request** must be accompanied with a copy of photographic identification e.g., passport or drivers licence. I declare that all the details I have given in this form are true and complete to the best of my knowledge.

Signature of Applicant …….. Date: ……..

Please return this form to the relevant address: **To the Chairperson of Board of Management,** **St Patrick's Boys' N.S.,** **Dublin Road,** **Limerick**