



DOMINICAN COLLEGE SION HILL

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DATA PROTECTION POLICY

1. Introduction

In Dominican College Sion Hill, we aim to support every member of our school community to reach their full potential in a happy, safe and secure environment. This includes respect for the protection of data stored at the school and for the right of access to this data. The policy applies to all school staff, the Board of Management, parents/guardians, students, (including prospective students) and their parents/guardians and applicants for positions within the school.

2. Purpose and Scope

- The purpose of this Data Protection Policy is to support the school in meeting its responsibilities with regard to the processing of personal data. These responsibilities arise as statutory obligations under the relevant data protection legislation. They also stem from our desire to process all personal data in an ethical manner which respects and protects the fundamental rights and freedoms of natural persons.
- This policy aims to help transparency by identifying how the school expects personal data to be treated (or “processed”). It helps to clarify what data is collected, why it is collected, for how long it will be stored and with whom it will be shared.
- The Irish Data Protection Act (2018) and the European General Data Protection Regulation (2016) are the primary legislative sources. As such they impose statutory responsibilities on the school as well as providing a number of fundamental rights (for students, parents/guardians and staff and others) in relation to personal data.
- The school recognises the seriousness of its data processing obligations and has implemented a set of practices to safeguard personal data. Relevant policies and procedures apply to all school staff, boards of management, trustees, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school).
- Any amendments to this Data Protection Policy will be communicated through the school website and other appropriate channels, including direct communication with data subjects where this is appropriate. We will endeavour to notify you if at any time we propose to use Personal Data in a manner that is significantly different to that stated in our Policy, or, was otherwise communicated to you at the time that it was collected.

- The school 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. Formally, the statutory responsibility of Controller is assigned to the Board of Management. The Principal is assigned the role of co-ordinating the implementation of this Policy and for ensuring that all staff who handle or have access to Personal Data are familiar with their responsibilities.

Name	Responsibility
Board of Management	Data Controller
Principal	Implementation of Policy
All Staff	Adherence to the Data Processing Principles
Entire School Community	Awareness and Respect for all Personal Data

The Board of Management of Dominican College Sion Hill is committed to the principles of responsible data protection as outlined in the acts referred to above and to this end it will:

- obtain and fairly process personal data
- keep data for one or more specified lawful purposes
- process data in ways compatible with the purposes for which it was given initially
- securely store personal data
- ensure that personal data is accurate and up-to-date
- ensure that only relevant data is sought and stored
- retain data no longer than is necessary for the specified purpose or purposes for which it was given
- furnish a copy of personal data, or sensitive personal data to any individual, on request

3. Definitions as they Pertain to this Policy

For the purpose of this policy the following definitions apply:

Data means information in a form that can be processed. It includes both automated data (e.g. electronic data) and manual data. Automated data means any information on computer, or information recorded with the intention that it be processed by computer. Manual data means information that is kept/recorded as part of a relevant filing system or with the intention that it form part of a relevant filing system.

Relevant filing system means any set of information that, while not computerised, is structured by reference to individuals or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily, quickly and easily accessible.

Personal Data means data relating to 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.

Sensitive Personal Data refers to Personal Data regarding a person's

- racial or ethnic origin, political opinions or religious or philosophical beliefs

- membership of a trade union
- physical or mental health condition or sexuality
- commission or alleged commission of any offence

4. Wider Legal Obligations

The provisions of this policy take cognisance of the school's legal obligations and responsibilities in areas directly relevant to data protection, as outlined below:

- 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.
- 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, the National Education Welfare Board, the National Council for Special Education, other schools, other centres of education) provided the School is satisfied that it will be used for a relevant purpose.
- 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 ("SENOs")) 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 schools are not currently subject to freedom of information legislation, 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 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: National Guidance for the Protection and Welfare of Children

(2011) published by the Department of Children & Youth Affairs, schools, their boards of management and their staff have responsibilities to report child abuse or neglect to TUSLA - Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

5. Managing Personal Data

At Dominican College Sion Hill, the personal data records sought and retained by the school may include but are not limited to those listed below:

A. Student records:

It is the responsibility of parents/guardians to inform the school of any update to their child's data.

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
- records of significant achievements
- whether the student is repeating the Leaving Certificate
- whether the student is exempt from studying Irish
- records of disciplinary issues/investigations and/or sanctions imposed
- Garda vetting outcome record (where the student is engaged in work experience organised with or through the school which requires that they be Garda vetted)
- 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 mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).
- examination results including state examinations

The rationale for seeking and retaining student records is as follows:

- 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 daughter's educational progress
- to meet the educational, social, physical and emotional requirements of the student
- to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school.
- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirements for their course,
- to ensure that any student seeking an exemption from Gaeilge 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 third-level educational institutions and/or prospective employers

Student data is kept both in manual form, within a relevant filing system and on computer files. Computer files require a password and employees are required to maintain the confidentiality of any data to which they have access.

Retention period: Please see Appendix 1 – Records Retention Schedule

B. Staff records:

It is the responsibility of staff to inform the school of any update to their personal data.

These staff records may include:

- name, address and contact details, PPS number , TC number
- 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 mandatory reporting legislation and/or child-safeguarding guidelines (subject to the DES Child Protection Procedures).

The rationale for seeking and retaining a staff member's personal data is as follows:

- to facilitate the management and administration of school business
- to facilitate the payment of staff, and calculate other benefits/ entitlements
- to facilitate pension payments in the future

- to manage human resources
- to record 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 under the Safety, Health and Welfare At Work Act 2005
- to enable the school to comply with requirements set down by the Department of Education and Skills, the Revenue Commissioners, the National Council for Special Education, TUSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies
- for compliance with legislation relevant to the school.

Staff data is kept both in manual form, within a relevant filing system and on computer files. Computer files require a password and employees are required to maintain the confidentiality of any data to which they have access.

Retention period: Please see Appendix 1 – Records Retention Schedule

C. Board of management records:

These may include:

- Name, address and contact details of each member of the Board of Management (including former members)
- Records in relation to appointments to the Board
- Minutes of Board of Management meetings and correspondence to the Board that may include references to particular individuals.

The rationale for seeking and retaining Board of Management data is as follows:

- 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.
- Board of Management data is kept both in manual form, within a relevant filing system and on computer files. Computer files require password and employees and Board of Management members are required to maintain the confidentiality of any data to which they have access.

Retention period: Please see Appendix 1 – Records Retention Schedule

D. Creditors/Debtors

The school may hold some or all of the following information about creditors and/or debtors:

- name
- address
- contact details
- PPS number
- tax details
- bank details
- amount paid

- amount owed

The rationale for seeking and retaining a creditor's/debtor's personal data is as follows:

- 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.

Retention period: Please see Appendix 1 – Records Retention Schedule

E. October Returns

At the beginning of each academic year (and for 1st year or transferring students, on enrolment) parents/guardians and students are asked to provide the school with certain information so that the School can make returns to the Department of Education and Skills ("DES") referred to as "October Returns". These October Returns will include sensitive personal data regarding personal circumstances which are provided by parents/guardians and students on the basis of explicit and informed consent. The October Return contains individualised data (such as an individual student's PPS number) which acts as an identifier for the DES to validate the data that belongs to a recognised student. The DES also transfers some of this data to other government departments and other State bodies to comply with legislation, such as transfers to the Department of Social Protection pursuant to the Social Welfare Acts, transfers to the State Examinations Commission, transfers to the Educational Research Centre, and transfers to the Central Statistics Office pursuant to the Statistics Acts. The data will also be used by the DES for statistical, policy-making and research purposes. However the DES advises that it does not use individual data, but rather aggregated data is grouped together for these purposes. The DES has a data protection policy which can be viewed on its website (www.education.ie). The DES has also published a "Fair Processing Notice" to explain how the personal data of students and contained in October Returns is processed. This can also be found on www.education.ie (search for Circular Letter 0047/2010 in the "Circulars" section).

The rationale for seeking and retaining personal data pertinent to October returns is as follows:

- The school asks parents/guardians and students to complete October Returns for the purposes of complying with DES requirements to determine staffing and resource allocations and to facilitate the orderly running of the school.
- Personal data pertaining to October Returns is kept both in manual form, within a relevant filing system and on computer files. Computer files require password and employees are required to maintain the confidentiality of any data to which they have access.

Retention period: Please see Appendix 1 – Records Retention Schedule

F. CCTV Records

The school processes personal data in the form of recorded CCTV images. We use CCTV for the following purposes:

- to secure and protect the school's premises and assets;
- to deter crime and anti-social behaviour;
- to assist in the investigation, detection, and prosecution of offences;
- to monitor areas in which cash and/or goods are handled;
- to deter bullying and/or harassment;

- to maintain good order and ensure the school's Code of Behaviour is respected;
- to provide a safe environment for all staff and students;
- for the taking and defence of litigation;
- for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and where the recordings may be capable of resolving

Retention period: Please see Appendix 1 – Records Retention Schedule

6. Personal Data Breaches

Definition of a Personal Data Breach A personal data breach is defined as 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.

Consequences of a Data Breach

- A breach can have a significant adverse effect on individuals, which can result in physical, material or non-material damage. This can include discrimination, identity theft or fraud, financial loss, damage to reputation, loss of confidentiality etc. Children because of their age may be particularly impacted.
- In addition to any detrimental impact on individual data subjects, a data breach can also cause serious damage to the school. This can include reputational damage as well as exposing the school to other serious consequences including civil litigation.
- It should be noted the consequences of a data breach could include disciplinary action, criminal prosecution and financial penalties or damages for the school and participating individuals

Responding to a Data Breach

- The school will always act to prioritise and protect the rights of those individuals whose personal data is affected.
- As soon as the school becomes aware that an incident has occurred, measures will be taken to assess and address the breach appropriately, including actions to mitigate any possible adverse effects.
- Where the school believes that there is a risk to the affected individuals, the school will (within 72 hours of becoming aware of the incident) submit a report to the Data Protection Commission.
- Where a breach is likely to result in a high risk to the affected individuals, the school will inform those individuals without undue delay.

7. Data Subject Rights

Your Rights Personal Data will be processed by the school in a manner that is respectful of the rights of data subjects. Under GDPR these include

- the right to information
- the right of access
- the right to rectification

- the right to erasure (“right to be forgotten”)
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision making
- the right to withdraw consent
- the right to complain.

Right to be Informed You are entitled to information about how your personal data will be processed. We address this right primarily through the publication of this Data Protection Policy. We also publish additional privacy notices/statements which we provide at specific data collection times. Should you seek further clarification, or information that is not explicit in our Policy or Privacy Statements, then you are requested to forward your query to the school.

Right of Access You are entitled to see any information we hold about you. The school will, on receipt of a request from a data subject, confirm whether or not their personal data is being processed. In addition, a data subject can request a copy of their personal data. The school in responding to a right of access must ensure that it does not adversely affect the rights of others.

Right to rectification If you believe that the school holds inaccurate information about you, you can request that we correct that information. The personal record may be supplemented with additional material where it is adjudged to be incomplete.

Right to be forgotten Data subjects can ask the school to erase their personal data. The school will act on such a request providing that there is no compelling purpose or legal basis necessitating retention of the personal data concerned.

Right to restrict processing Data subjects have the right to seek a restriction on the processing of their data. This restriction (in effect requiring the controller to place a “hold” on processing) gives an individual an alternative to seeking erasure of their data. It may also be applicable in other circumstances such as where, for example, the accuracy of data is being contested.

Right to data portability This right facilitates the transfer of personal data directly from one controller to another. It can only be invoked in specific circumstances, for example, when processing is automated and based on consent or contract.

Right to object Data subjects have the right to object when processing is based on the school’s legitimate interests or relates to a task carried out in the public interest. The school must demonstrate compelling legitimate grounds if such processing is to continue.

Right not to be subject to automated decision making This right applies in specific circumstances (as set out in GDPR Article 22).

Right to withdraw consent In cases where the school is relying on consent to process your data, you have the right to withdraw this at any time, and if you exercise this right, we will stop the relevant processing.

Limitations on Rights While the school will always facilitate the exercise of your rights, it is recognised that they are not unconditional: the school may need to give consideration to other obligations.

Right to Complain

If you are concerned about how your personal data is being processed, then please address these concerns in the first instance to the Principal who is responsible for operational oversight of this policy.

A matter that is still unresolved may then be referred to the school's Data Controller (i.e., the Board of Management) by writing to the Chairperson c/o school.

Should you feel dissatisfied with how we have addressed a complaint or concern that you have raised, you have the right, as data subject, to bring the matter to the attention of the Irish Data Protection Commission.

Telephone	+353 57 8684800 +353 (0)761 104 800
Lo Call Number	1890 252 231
Fax	+353 57 868 4757
E-mail	info@dataprotection.ie
Post	Data Protection Commission Canal House, Station Road Portarlinton, Co. Laois R32 AP23
Website	www.dataprotection.ie

8. Ratification

The Board of Management ratified the policy on 25th May 2021.

It will be reviewed every three years or more often should the Board of Management think it necessary in light of changed or amended legislation. Any review will continue to be guided by the school's characteristic spirit and commitment to its responsibilities under data protection legislation.

Signed:

Mr Paul Meany
Chairperson.

Dr Orla Condren
Principal/Secretary to Board of Management

Appendix 1 – Records Retention Schedule, Dominican College Sion Hill

Student Records	Duration	Final disposition	Comments
Registers/Roll books	Indefinitely	N/A	Indefinitely. Archived when class leaves + 2 years
State exam results	N/A	N/A	SEC responsibility to retain, not a requirement for school to retain.
Enrolment Forms	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)	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	N/A	Never destroy
Results of in-school tests/exams (i.e. end of term, end of year exams, assessment results)	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).
End of term/year reports	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	N/A	Never destroy
Scholarship applications e.g. Gaeltacht, book rental scheme	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	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 Síochana in the future.
Student Sensitive Personal Data	Duration	Final disposition	Comments
<ul style="list-style-type: none"> Psychological assessments Special Education Needs' files, reviews, correspondence and Individual Education Plans Accident reports 	Indefinitely	N/A	Never destroy

<ul style="list-style-type: none"> Child protection records 			
Section 29 appeal records	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	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)
Unsuccessful Candidates for Interview	Duration	Final disposition	Comments
<ul style="list-style-type: none"> Applications & CVs of candidates called for interview Database of applications Selection criteria Applications of candidates not shortlisted Unsolicited applications for jobs Candidates shortlisted but unsuccessful at interview Candidates shortlisted and are successful but do not accept offer Interview board marking scheme & board notes Panel recommendation by interview board 	18 months from close of competition	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Workplace Relation Commission to inform the school that a claim is being taken.
Staff personnel files	Duration	Final disposition	Comments
Staff personnel files e.g. applications, qualifications, references, recruitment, job specification, contract, Teaching Council registration, records of staff training etc.	Retain for duration of employment plus 7 years	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)
Application & C.V.	Retain for duration 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)

	plus 7 years		
Interview: database of applications (the section which relates to the employee only)	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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)
	7 years		
Job specification/ description	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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	Retain for duration of employment plus 7 years	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)	Retain for duration of employment plus 7 years	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, including jobshare, career break, maternity/paternity leave, parental leave , force majeure and carer's leave	Retain for duration of employment plus 7 years	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)

Allegations/complaints	Retain for duration of employment plus 7 years *	Confidential shredding	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). *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 *	Confidential shredding	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). *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.
Sickness absence records/certificates	Retain for 7 years*	Confidential shredding or N/A (see comment)	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), *Note 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. Occupational health referral, correspondence re retirement on ill-health grounds, medical assessments or referrals	Retain for 7 years*	Confidential shredding or N/A (see comment)	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), *Note 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	Retain for 10 years, or the duration of the employment plus 7 years*	Confidential shredding or N/A (see comment)	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 (*Note 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).
Sick leave records (sick benefit forms)	Current year plus 7 years	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)
Records of previous service (incl. correspondence with previous employers)	Indefinitely	N/A	DES advise that these should be kept indefinitely.
Pension calculation, pension increases	Duration of employment + 7 years	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	Duration of	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the

	employment + 7 years		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)
Board of Management Records	Duration	Final disposition	Comments
Board agenda and minutes	Indefinitely	N/A	Indefinitely. These should be stored securely on school property.
School closure	On school closure, records should be transferred (see comments)	N/A	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.
Any government returns which identify individual staff/pupils	See comments	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.
Financial Records	Duration	Final disposition	Comments
Certified Accounts	Indefinitely	N/A	
Payroll and taxation	Indefinitely	N/A	
Invoices/back-up records/receipts	Indefinitely	N/A	
Promotion Process	Duration	Final disposition	Comments
Posts of Responsibility	Indefinitely	N/A	Successful candidates: Retain indefinitely on master file as it relates to pay/pension etc. (See DES guidelines). For unsuccessful candidates retain for 18 months and then destroy by confidential shredding. If an appeal is lodged before the 18 months has expired, retain for duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school)
Calculation of service	Indefinitely	N/A	Retain indefinitely on master file
Promotions/POR Board master files	Indefinitely	N/A	Retain indefinitely on master file
Promotions/POR Boards assessment report files	Indefinitely	N/A	Retain original on personnel file in line with retention periods in "Staff Records" retention guidelines above
POR appeal documents	Duration of	Confidential shredding	Retain original on personnel file, and copy of master & appeal file. Retain for

	employment + 7 years*		duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school). *Note Copy on master and appeal file.
Correspondence from candidates re feedback	See comments for more information		Depends upon the nature of the feedback. If feedback is from unsuccessful candidate, keep in line with retention periods in “Staff Records” above. If feedback is from successful candidate who is already and employee in the school, keep in line with “Staff personnel while in employment” above.
CCTV Records	Duration	Final disposition	Comments
CCTV Recordings	28 days (see comments for further information)	Safe /secure deletion	The school processes this data for the purposes outlined in our CCTV Policy. 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.

Appendix 2 – Glossary of Terms

Child - a person under the age of 18 years. Children are deemed as vulnerable under GDPR and merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data.

Controller or **Data Controller** - an entity or person who, alone or jointly with others, determines the purposes and means of the processing of personal data. In this policy, the data controller is the School.

Consent - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data Protection Commission - the national supervisory authority responsible for monitoring the enforcing the data protection legislation within Ireland. The DPC is the organisation to which schools as data controllers must notify data breaches where there is risk involved.

Data Protection Legislation – this includes (i) the General Data Protection Regulation (GDPR) - *Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*, and (ii) the Irish Data Protection Act (2018). GDPR is set out in 99 separate *Articles*, each of which provides a statement of the actual law. The regulation also includes 171 Recitals to provide explanatory commentary.

Data Subject - a living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.

Data concerning health - personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status. This is an example of special category data (as is data concerning special education needs).

Personal data - any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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.

Processing - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor or **Data Processor** - a person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract (but does not include an employee of a controller who processes such data in the course of his or her employment).

Profiling - any form of automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour.

(Relevant) Filing System - any set of information that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.

Special categories of data - personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of 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.