

Scoil Chrónáin, Ráth Cúil, Baile Átha Cliath

POLASÁI MAIDIR LE COSAINT SONRAÍ

Ráiteas Tosaigh

Baineann Polasaí Cosanta Sonraí na scoile leis na sonraí pearsanta atá i seilbh Bhord Bainistíochta na scoile (BB), atá cosanta ag na hAchtanna um Chosaint Sonraí 1988 agus 2018 agus Rialachán Ginearálta maidir le Cosaint Sonraí an AE (RGCS).

Baineann an polasaí seo le foireann uile na scoile, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus daoine eile (lena n-áirítear leanaí a bheidh ina ndaltaí nó leanaí a d'fhéadfadh a bheith ina ndaltaí agus a dtuismitheoirí/gcaomhnóirí agus iarratasóirí ar phoist foirne sa scoil), sa mhéid go mbaineann bearta an pholasaí leo. Stórálfar sonraí go slán chun go ndéanfar faisnéis rúnda a chosaint i gcomhlíonadh na reachtaíochta ábhartha. Leagtar amach an bealach ina gcosnóidh an scoil sonraí pearsanta agus catagóirí speisialta de shonraí pearsanta.

Tá modh “Príobháideacht d’aon Ghnó” i bhfeidhm ag Scoil Chrónáin i leith Cosanta Sonraí. Ciallaíonn sé sin go ndéanaimid pleanáil chúramach agus sonraí pearsanta á mbailiú againn chun gur féidir linn na prionsabail chosanta sonraí a áireamh mar bhun ghnéithe na n-oibríochtaí sonraí uile roimh ré. Déanfaimid iniúchadh ar an sonraí pearsanta inar seilbh chun:

1. A bheith in ann rochtain a thabhairt do dhaoine aonair ar a sonraí
2. coinneáil slán a chinntiú
3. doiciméadú a dhéanamh ar ár nósanna imeachta cosanta sonraí
4. cuntasacht agus trédhearcacht a fheabhsú

PRIONSABAIL CHOSANTA SONRAÍ

Is é BB na scoile an rialaitheoir sonraí i leith na sonraí pearsanta a bhaineann le foireann, daltaí, tuismitheoirí/caomhnóirí agus daoine eile de phobal na scoile, iad siúd atá ann anois, a bhí ann cheana agus a bheidh ann sa todhchaí. Dá réir sin, tá sé de cheangal ar an BB na prionsabail chosanta sonraí a leagtar amach sna hAchtanna um Chosaint Sonraí 1988 go 2018 agus RGCS a chomhlíonadh, ar féidir an achoimre seo a leanas orthu a dhéanamh:

1. Sonraí pearsanta a bhailiú agus a phróiseáil go cóir

Bailítear faisnéis i dtaobh daltaí le cabhair ó thuismitheoirí/caomhnóirí agus ón bhfoireann. Aistrítear faisnéis ó scoileanna eile freisin. Maidir le faisnéis atá i seilbh na scoile a bhaineann le daoine eile (baill foirne, daoine a chuireann isteach ar phoist sa scoil, tuismitheoirí/caomhnóirí daltaí, etc.), is gnách go gcuireann na daoine féin an fhaisnéis sin ar fáil le toiliú iomlán feasach agus go dtiomsaítear í i gcúrsa a bhfostaíochta nó a i gcúrsa a dteagmhála leis an Scoil. Pléitear leis na sonraí uile seo de réir na reachtaíochta Cosanta Sonraí agus i dtéarmaí an Pholasaí seo maidir le Cosaint Sonraí. Déanfar an fhaisnéis sin a bhailiú agus a phróiseáil go cóir.

Níl cead múinteoirí agus cúntóirí riachtanas speisialta a thaifeadh le linn cruinnithe i Scoil Chrónáin. Ní mór go múchfar meáin shoghluaiste uile mar fhóin phóca, iPad, etc. le linn cruinnithe.

2. Toiliú

I cás go bhfuil toiliú mar bhunús do shonraí pearsanta a chur ar fáil (e.g. sonraí atá ag teastáil le bheith mar bhall d’fhoireann spóirt, le gníomhaíocht iarscoile a dhéanamh nó chun aon gníomhaíocht scoile roghnach a dhéanamh), ní mór go dtabharfar an toiliú sin faoi shaoirse agus gur léiriú sainiúil feasach gan athbhrí é ar mhianta an ábhair sonraí. Beidh gníomh soiléir dearfach ag teastáil ó Scoil Chrónáin chun toiliú a léiriú e.g. bosca a thiceáil/doiciméad a shíniú. Is féidir le hábhair sonraí an toiliú a tharraingt siar sna cásanna sin.

Is chun oibleagáidí reachtaíochta agus tasc poiblí a chomhlíonadh a choinníonn Scoil Chrónáin roinnt taifead. Sna himthosca sin, níl toiliú an ábhair sonraí ag teastáil.

3. Sonraí a choinneáil ar mhaithe le cuspóir sonraithe sainráite amháin nó níos mó

Tá sé de cheangal ar an BB na cuspóirí atá le bailiú ag sonraí agus na húsáidí a bheartaíonn sé a bhaint as a gcuid sonraí a chur in iúl do dhaoine. Coinnítear faisnéis ar bhealach atá dírithe ar leas an duine i gcónaí.

4. Iad a phróiseáil ar bhealaí atá ag luí leis na cuspóirí lenar tugadh na sonraí an chéad uair riamh

Déanfar sonraí a bhaineann le daoine a phróiseáil ar bhealach a luíonn leis na cuspóirí lenar bailíodh iad amháin. Ní nochtfar faisnéis ach ar bhonn riachtanais, agus déanfar rialú docht ar rochtain ar an bhfaisnéis. Ní roinnfear sonraí le tríú páirtithe ach nuair is cuí é sin a dhéanamh.

5. Sonraí pearsanta a choinneáil slán sábháilte

Ní bheidh rochtain ag daoine ar an bhfaisnéis ach nuair atá cúis mhaith leis sin. Tá rochtain ag an BB, an príomhoide, an leas-phríomhoide, an rúnaí, feighlí na scoile agus comhairle na dtuismitheoirí ar sonraí de réir mar is cuí dá ról. Stóráiltear sonraí pearsanta faoi ghlas i gcás taifead de láimh agus faoi chosaint bogearraí ríomhaire agus pasfhocail i gcás sonraí leictreonacha. Tá gléasanna soghluaiste ar a bhfuil sonraí pearsanta stóráilte (mar ríomhairí glúine) cosanta ag pasfhocal.

6. Sonraí pearsanta a choinneáil cruinn, iomlán agus cothrom le dáta

Ní mór do dhaltaí, tuismitheoirí/caomhnóirí agus/nó don fhoireann aon athrú ar cheart don scoil a dhéanamh ar a sonraí pearsanta agus/nó sonraí pearsanta leochaileacha a chur in iúl don scoil le cinntiú go bhfuil na sonraí cruinn, iomlán agus cothrom le dáta. Agus é sin curtha in iúl don scoil, déanfaidh an scoil gach athrú is gá ar na taifid ábhartha. Ní ceart taifid a athrú nó a scriosadh gan údarú cuí a fháil. I gcás athrú/ceartú, déanfar nóta faoin údarú agus faoin athrú/faoi na hathruithe atá le déanamh ar an taifead/doiciméadú agus déanfar an nóta sin a shíniú.

7. Cinntiú go mbeidh siad leordhóthanach agus ábhartha agus nach mbeidh siad iomarcach

Ní bhaileofar agus ní stórálfar ach an méid faisnéise is gá leis chun seirbhís leordhóthanach a chur ar fáil.

8. Sonraí a choinneáil ar feadh tréimhse nach faide ná an tréimhse atá riachtanach le haghaidh an chuspóra nó na gcuspóirí lenar tugadh iad

Mar riail ghinearálta, coinneofar an fhaisnéis fad is atá an duine sa scoil. Ina dhiaidh sin, comhlíonfaidh an scoil treoirínte na Roinne Oideachais agus Scileanna maidir le sonraí pearsanta a bhaineann le dalta a stóráil. I gcás ball foirne, comhlíonfaidh an scoil treoirínte na Roinne Oideachais agus Scileanna agus riachtanais na gCoimisinéirí Ioncaim maidir le taifid a bhaineann le fostaithe a choinneáil. Féadfaidh an scoil sonraí a bhaineann le duine a choinneáil ar feadh tréimhse níos faide chun na forálacha cuí faoin reachtaíocht fostaíochta a chomhlíonadh agus/nó éileamh faoi dhlí na gconarthaí agus/nó faoin dlí sibhialta a chosaint. Coinnítear sonraí i gcomhadchaibinéid i seomraí ranga, i seomraí tacaíochta foghlama, in oifig an príomhoide agus oifig an rúnaí agus in dhá limistéar stórála ainmnithe. Féach agusín 1 ina bhfuil na Tréimhsí Coinneála Sonraí le haghaidh Scoileanna. Tá an scoil freagrach as sonraí a scriosadh ar dhul in éag na tréimhse coinneála.

9. Cóip dá s(h)onraí pearsanta a chur ar fáil do dhuine arna iarraidh sin

Tá sé de cheart ag daoine rochtain a bheith acu ar na sonraí pearsanta a bhaineann leo atá á gcoinneáil agus fios a bheith acu cé atá á gcoinneáil agus cén cuspóir lena bhfuil siad á gcoinneáil. Tá an scoil, is é sin an Príomhoide, freagrach as na sonraí sin a chur ar fáil má iarrtar sin.

SCÓIP

Baineann an reachtaíocht Chosanta Sonraí le Sonraí Pearsanta a choinneáil agus a phróiseáil. Is é aidhm an pholasáí seo ná cabhrú leis an scoil a hoibleagáidí reachtaíochta a chomhlíonadh, na hoibleagáidí sin a mhíniú d'fhoireann na scoile, agus an bealach ina bpléifear leis na sonraí sin a chur in iúl don fhoireann, do dhaltáí agus dá dtuismitheoirí/caomhnóirí.

Baineann an polasáí le foireann uile na scoile, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus daoine eile (lena n-áirítear leanaí a bheidh ina ndaltaí nó leanaí a d'fhéadfadh a bheith ina ndaltaí agus a dtuismitheoirí/gcaomhnóirí agus iarratasóirí ar phoist foirne sa scoil), a mhéid a láimhseálfar nó a phróiseálfar a sonraí pearsanta agus iad ag plé leis an scoil.

Sainmhíniú ar théarmaí cosanta sonraí

Chun go dtuigeann an fhoireann oibleagáidí na scoile i gceart, tá roinnt téarmaí tábhachtacha ann ar cheart dóibh iad a thuiscint:

Ciallaíonn *Sonraí Pearsanta Data* aon fhaisnéis a bhaineann le duine nádúrtha sainitheanta nó inaitheanta i.e. duine beo a shainaithnítear nó is féidir a shainaithint ó na sonraí nó ó na sonraí in éineacht le faisnéis eile atá i seilbh an Rialaitheora Sonraí (BB) nó is dócha a thiocfaidh i seilbh an Rialaitheora Sonraí.

Is é an Rialaitheoir Sonraí Bord Bainistíochta na scoile

Ábhar Sonraí – duine aonair is ábhar do shonraí pearsanta

Próiseáil Sonraí – aon oibríocht nó aon sraith oibríochtaí a dhéanamh i leith na sonraí, lena n-áirítear:

- Sonraí a fháil, a thairfeadh nó a choinneáil
- Sonraí a bhailiú, a eagrú, a stóráil, a athrú nó a oiriúnú
- Sonraí a aisghabháil, a cheadú nó a úsáid
- Sonraí a nochtadh trí tharchur, scaipeadh nó trí chur ar fáil ar bhealach eile
- Sonraí a ailíniú, a chomhcheangal, a bhlocáil, a léirsciosadh nó a dhíothú

Próiseálaí Sonraí – duine a phróiseálann faisnéis phearsanta ar son an phróiseálaí sonraí, ach ní áirítear ann sin fostaí an phróiseálaí sonraí a phróiseálann na sonraí sin i gcúrsa a f(h)ostaíochta, mar shampla, fostaí eagraíochta a gcuireann an próiseálaí sonraí obair amach chuici. Faoin reachtaíocht Chosanta Sonraí tá freagrachtaí ar eintitis den chineál sin i dtaobh na próiseála sonraí a dhéanann siad. Baineann Scoil Chrónáin úsáid as an bpróiseálaí sonraí Aladdin.

Tagraíonn *Catagóirí speisialta sonraí pearsanta* do Shonraí Pearsanta a bhaineann leis na nithe seo a leanas:

- tionscnamh ciníoch nó eitneach
- tuairimí polaitiúla nó creidimh reiligiúnacha nó fealsúnacha
- sláinte fisiciúil nó mheabhrach
- cleachtadh gnéis nó claonadh gnéasach
- sonraí géiniteacha agus bith mhéadracha
- ciontuithe coiriúla nó déanamh líomhnaithe ciona
- ballraíocht i gceardchumann

Sárú i ndáil le sonraí pearsanta – sárú ar shlándáil as a dtiocfaidh scriosadh, cailleadh, athrú, nó nochtadh neamhúdaraíthe sonraí pearsanta a rinneadh a tharchur, a stóráil nó a phróiseáil ar bhealach eile, nó rochtain neamhúdaraíthe ar na sonraí sin, bíodh sé sin de thaisme nó neamhdhleathach. Ciallaíonn sé sin aon chur as d’fhaisnéis phearsanta nó aon chailliúint sonraí pearsanta, is cuma conas a tharlaíonn sé nó cén áit a dtarlaíonn sé.

RÉASÚNAÍOCHT

I dteannta a hoibleagáidí faoi chúram leathan na reachtaíochta oideachais, tá oibleagáid dhlíthiúil ar an scoil na hAchtanna um Chosaint Sonraí 1988 go 2018 agus an RGCS a chomhlíonadh. Tá míniú sa pholasáí seo ar cén cineál sonraí a bhailítear, cén fáth a mbailítear iad, cá fhad a stórálfar iad (féach an tréimhse choinneála sonraí in aguisín 1) agus cé leis a roinnfear iad. Tá an scoil dáiríre faoina freagrachtaí faoin dlí cosanta sonraí agus is mian léi cleachtais shlána a chur i bhfeidhm chun sonraí pearsanta an duine aonair a chosaint. Aithnítear leis go n-éascaíonn taifeadh cruinn agus stóráil slán faisnéise fíorasáil le measúnú a dhéanamh ar an bhfaisnéis sin, chun go mbeidh an Príomhoide agus an Bord Bainistíochta in ann cinntí a dhéanamh leis an scoil a rith go héifeachtach. Tá láimhseáil éifeachtach sonraí ríthábhachtach freisin do chomhsheasmhacht agus leanúnachas a chinntiú i gcás ina mbeidh athrú ar phearsanra na scoile nó ar phearsanra an Bhoird Bainistíochta.

OIBLEAGÁIDÍ DLÍ EILE

Cuirtear oibleagáidí dlí agus freagrachtaí eile na scoile san áireamh i gcur i bhfeidhm an pholasáí seo. Baineann roinnt acu sin go díreach le cosaint sonraí. Mar shampla:

Faoi *Alt 9(g) den Acht Oideachais, 1998*, ní mór rochtain a thabhairt do thuismitheoirí daltaí nó, i gcás dalta a bhfuil 18 mbliana d'aois slánaithe aige nó aici, don dalta, ar thaifid a choimeádann an scoil i ndáil le dul chun cinn oideachais an dalta sin.

Faoi *Alt 20 den Acht Oideachais (Leas), 2000*, ní mór don scoil clár de na daltaí go léir atá ag freastal ar an scoil a choinneáil.

Faoi *Alt 20(5) den Acht Oideachais (Leas), 2000*, ceanglaítear ar an bPríomhoide fógra a thabhairt do Phríomhoide scoile eile a bhfuil an páiste ag aistriú chuici faoi fhaisnéis áirithe i leith fhreastal an pháiste ar scoil agus i leith cúrsaí eile a bhaineann le dul chun cinn oideachais an pháiste. Seolann Scoil Chrónáin cóip sa phost de Phas Oideachais an pháiste, a sholáthraíonn an Chomhairle Náisiúnta Curaclaim agus Measúnachta, chuig Príomhoide na hiar-bhunscoile ina bhfuil an dalta cláraithe.

I gcás go bhfuil tuarascálacha ar dhaltaí a rinneadh gairmithe, seachas foireann Scoil Chrónáin, i gcomhaid daltaí, ní chuirtear na tuarascálacha sin chuig an iar-bhunscoil ach amháin tar éis cead sainráite i scríbhinn a iarraidh ar thuismitheoirí na ndaltaí sin agus an cead sin a fháil.

Faoi *Alt 21 den Acht Oideachais (Leas), 2000*, ní mór don scoil freastal nó neamh fhreastal na ndaltaí atá cláraithe sa scoil a thaifeadh gach lá scoile.

Faoi *Alt 28 den Acht Oideachais (Leas), 2000*, féadfaidh an Scoil Sonraí Pearsanta atá ina seilbh a chur ar fáil do chomhlachtaí áirithe forordaithe (an Roinn Oideachais agus Scileanna, Tusla, an Chomhairle Náisiúnta um Oideachas Speisialta agus scoileanna eile). Ní mór don BB a bheith deimhin de go n-úsáidfear na sonraí chun ‘críche íomchú’ (lena n-áirítear stair oideachais nó oiliúna a thaifeadh nó monatóireacht a dhéanamh ar a d(h)ul chun cinn oideachais nó oiliúna; nó chun tairghe a dhéanamh ar scrúduithe, rannpháirtíocht san oideachas agus éifeachtacht ghinearálta

oideachais nó oiliúna).

Faoi Alt 14 den Acht um Oideachas do Dhaoine a bhfuil Riachtanais Speisialta Oideachais acu, 2004, tá sé de cheangal ar an scoil cibé faisnéis a d'fhéadfadh an Chomhairle Náisiúnta um Oideachas a iarraidh le réasún ó am go ham a chur ar fáil don Chomhairle (agus a fostaithe, lena n-áireofaí, de réir réasúin, Eagraithe Riachtanas Oideachas Speisialta).

Faoin Acht um Shaoráil Faisnéise, 1997, tá ceart coinníollach rochtana ar fhaisnéis nach 'sonraí pearsanta' í atá i seilbh comhlachtaí poiblí, mar atá i gceist leis an reachtaíocht chosanta sonraí. Cé nach bhfuil formhór na scoileanna faoi réir na reachtaíochta um shaoráil faisnéise (seachas scoileanna faoi stiúir Bhord Oideachais agus Oiliúna), má tá faisnéis tugtha ag scoil do chomhlacht a chlúdaítear faoin Acht um Shaoráil Faisnéise (mar an Roinn Oideachais agus Scileanna, etc.), féadfaidh an comhlacht na taifid sin a nochtadh má iarrtar sin air.

Faoi Alt 26(4) den Acht Sláinte, 1947 cuirfidh an Scoil faoi deara go gcuirfear gach saoráid réasúnach ar fáil d'údarás sláinte a thugann fógra di go ndéanfar scrúdú leighis, e.g. scrúdú fiacloireachta.

Faoin Acht um Thús Áite do Leanaí, 2015, tá freagracht ar dhaoine sainorduithe ábhair imní i dtaca le leas páistí a thuairisciú do TUSLA – An Ghníomhaireacht um Leanaí agus an Teaghlach (nó i gcás éigeandála agus mura bhfuil TUSLA ar fáil, don Gharda Síochána)

GAOL LE SPIORAD NA SCOILE:

Féachann Scoil Chrónáin le:

- cabhrú le daltaí barr a gcumais a bhaint amach
- timpeallacht foghlama shlán shábháilte a chur ar fáil
- meas a chothú ar an éagsúlacht luachanna, creideamh, traidisiún, teangacha agus modhanna maireachtála atá sa tsochaí

Is mian leis an scoil na haidhmeanna/misin seo a bhaint amach agus cearta daoine aonair chun príobháideachta agus a gcearta faoin reachtaíocht Chosanta Sonraí á urramú go hiomlán againn.

SONRAÍ PEARSANTA

Féadfaidh na taifid seo a leanas a bheith san áireamh ar na taifid Sonraí Pearsanta atá i seilbh na scoile:

1. *Taifid foirne:*

a) Catagóirí sonraí foirne:

Chomh maith leis na baill foirne atá ann (agus baill foirne a bhí ann), féadfar go mbainfidh na taifid sin le hiarratasóirí ar phoist sa scoil, múinteoirí faoi oiliúint agus múinteoirí faoi phromhaidh. Féadfaidh na nithe seo a leanas a bheith san áireamh ar na taifid sin:

- Ainm, seoladh agus sonraí teagmhála, uimhir PSP
- Ainm agus sonraí teagmhála neasghaoil i gcás éigeandála
- Taifid bhunaidh ar iarratas agus ceapadh i leith ardú céime
- Sonraí maidir le neamhláithreachta ceadaithe (sosanna gairme, saoire do thuismitheoirí, saoire staidéir, etc.)
- Sonraí maidir le taifid oibre (cáilíochtaí, ranganna a múineadh, ábhair, etc.)
- Sonraí maidir le haon timpistí/gortuithe a tharla ar thalamh na scoile nó a bhain le baill foirne agus iad i mbun a ndualgas scoile
- Sonraí maidir le haon tuairiscí i leith baill foirne a thug an scoil (nó a fostaithe) do ranna

- Stáit agus/nó do ghníomhaireachtaí eile faoin Acht um Thús Áite do Leanaí, 2015
- Sonraí leighis na foirne

b) Cuspóirí:

Coinnítear taifid foirne leis na cuspóirí seo a leanas:

- gnó na scoile a bhainistiú agus a riar (anois agus amach anseo)
- íoc na foirne a éascú agus chun sochair/teidlíochtaí eile a ríomh (lena n-áirítear seirbhís
- ináirithe chun íocaíochtaí pinsin, teidlíochtaí agus/nó íocaíochtaí iomarcaíochta a ríomh
- nuair is ábhartha)
- éascú le híocaíochtaí pinsin a dhéanamh amach anseo
- acmhainní daonna a bhainistiú
- arduithe céime (doiciméadú a bhaineann le harduithe céime ar cuireadh isteach orthu)
- agus athruithe ar fhreagrachtaí, etc. a thairfeadh
- chun go mbeidh an scoil in ann a hoibleagáidí mar fhostóir a chomhlíonadh, lena náirítear timpeallacht oibre agus teagaisc atá sábháilte agus éifeachtach a chothú (lena n-áirítear a hoibleagáidí faoin Acht um Shábháilteacht, Sláinte agus Leas ag an Obair, 2005, a chomhlíonadh)
- chun go mbeidh an scoil in ann na ceanglais atá leagtha síos ag an Roinn Oideachais agus Scileanna, na Coimisinéirí Ioncaim, an Chomhairle Náisiúnta um Oideachas Speisialta, TUSLA, an FSS agus aon ranna rialtais, stáit agus/nó aon ranna rialála agus/nó aon ghníomhaireachtaí a chomhlíonadh
- agus chun an reachtaíocht a bhaineann leis an scoil a chomhlíonadh

c) Nósanna imeachta Scoil Chrónáin maidir le Slándáil agus Suíomh:

a. Coinnítear taifid de láimh i gcomhadchaibinéad glasáilte in oifig riaracháin ghlasáilte nach bhfuil rochtain uirthi ach ag pearsanra a bhfuil an t-údarás acu na sonraí a úsáid. Ní mór d'fhostaithe na sonraí a bhfuil rochtain acu orthu a choinneáil faoi rún.

b. Stóráiltear taifid dhigiteacha ar ríomhaire faoi chosaint pasfhocail air in oifig ghlasáilte.

2. Taifid daltaí:

a) Catagóirí sonraí daltaí:

Féadfaidh na catagóirí seo a leanas a áireamh orthu:

- Faisnéis a fhéadfar a iarraidh agus a thairfeadh nuair a chláraítear dalta agus a fhéadfar í a chomhardú agus a thiomsú fad is atá an dalta sa scoil. Féadfaidh an fhaisnéis seo a leanas a bheith san áireamh ar na taifid sin:
- ainm, seoladh, sonraí teagmhála, uimhir PSP
- dáta breithe agus ionad breithe
- ainmneacha agus seoltaí tuismitheoirí/caomhnóirí agus a sonraí teagmhála (lena n-áirítear aon socrúithe speisialta i leith caomhnóireachta, coimeádta nó rochtana)
- creideamh reiligiúnach
- bunús ciníoch nó eitneach
- an duine den Lucht Siúil é/í, más ábhartha
- an sealbhóir carta leighis é/í (nó a t(h)uismitheoirí)
- an é Béarla teanga dhúchais an dalta agus/nó an bhfuil tacaíocht Bhéarla ag teastáil uaidh/uaithi
- aon choinníollacha speisialta ábhartha (e.g. riachtanais oideachais speisialta, fadhbanna sláinte, etc.)
- Eolas ar thairfead acadúil an dalta sular thosaigh sé/sí sa scoil (lena n-áirítear tuairiscí,

teistiméireachtaí agus taifid eile ó scoileanna ar fhreastail an dalta orthu roimhe)

- Measúnachtaí síceolaíochta, síciatrachta agus/nó leighis
- Taifid freastail
- Déantar grianghraif agus íomhánna taifeadta de na daltaí (lena n-áirítear imeachtaí scoile nó ócáidí nuair a tugadh aird ar a raibh bainte amach ag dalta) a bhainistiú de réir an pholasaí an scoile i leith grianghrafadóireachta a ghabhann leis seo
- Taifead acadúil – ábhair a ndearnadh staidéar orthu, tascanna ranga, torthaí
- scrúduithe mar a thaifeadtar i dtuairiscí oifigiúla scoile
- Taifid ar rudaí suntasacha a bhain an dalta amach
- Taifid ar shaincheistean/fiosrúcháin araíonachta agus/nó ar phionóis
- Taifid eile, e.g. taifid ar aon ghortuithe/timpistí tromchúiseacha, etc.
- Taifid ar aon tuairiscí i leith an dalta a thug an scoil (nó a fostaithe) do ranna Stáit agus/nó gníomhaireachtaí eile faoin Acht um Thús Áite do Leanaí, 2015. Coinneofar na taifid seo i gcaibinéad dódhíonach. Is samplaí de na doiciméid sin Tuarascálacha Maoirseachta maidir le Cosaint Leanaí agus na Doiciméid Cháschomhaid.

b) Cuspóirí: Ar na cuspóirí lena gcoinnítear taifid dalta tá:

- chun go mbeidh gach dalta in ann barr a c(h)umais a bhaint amach
- ceanglais reachtaíochta nó riaracháin a chomhlíonadh
- cinntiú gur féidir le daltaí incháilithe leas a bhaint as teagasc breise nó tacaíocht
- airgeadais ábhartha
- tacú le teagasc reiligiúnach a sholáthar
- chun gur féidir teagmháil le tuismitheoirí/caomhnóirí i gcás éigeandála nó i gcás dhúnadh na scoile, nó chun dul chun cinn oideachais a bpáiste a chur in iúl do tuismitheoirí nó chun eolas ar imeachtaí scoile, etc. a thabhairt do tuismitheoirí
- chun freastal ar riachtanais oideachais, sóisialta, fisiciúla agus mothúcháin an dalta
- glactar le grianghraif agus íomhánna taifeadta chun ceiliúradh a dhéanamh ar a bhfuil bainte amach ag an scoil, e.g. leabhair bhliantúla a thiomsú, suíomh idirlín scoile a thógáil, imeachtaí scoile a thaifeadadh, agus chun stair na scoile a thaifeadadh.
- Coinnítear taifid den chineál sin agus baintear úsáid astu de réir an 'Fógra Príobháideachais do Tuismitheoirí/Caomhnóirí'.
- cinntiú go gcomhlíonann an dalta critéir iontrála na scoile
- cinntiú go gcomhlíonann daltaí an riachtanas aoise íosta chun freastal ar bhunscoil
- doiciméid/faisnéis mar gheall ar dhalta a chur ar fáil don Roinn Oideachais agus Scileanna, an Chomhairle Náisiúnta um Oideachas Speisialta, Tusla, scoileanna eile, etc. i gcomhlíonadh an dlí agus teoracha ranna rialtais.
- doiciméid/faisnéis/teistiméireachtaí a chur ar fáil d'institiúidí oideachais dara leibhéal
- nuair a iarrann an dalta sin (nó a t(h)uismitheoirí/c(h)aomhnóirí i gcás dalta nach bhfuil 18 mbliana d'aois slánaithe aige nó aici)

c) (Nósanna imeachta Suímh agus Slándála mar atá thuas):

3. Taifid Boird Bainistíochta:

a) Catagóirí sonraí Boird Bainistíochta:

- Ainm, seoladh agus sonraí teagmhála gach comhalta den Bhord Bainistíochta (lena n-áirítear iarchomhaltaí an Bhoird Bainistíochta)
- Taifid maidir le ceapacháin chun an Bhoird
- Miontuairiscí ar chruinnithe an Bhoird Bainistíochta agus comhfhreagras chuig an

- mBord a bhféadfaidh tagairtí do dhaoine aonair a bheith ann

b) Cuspóirí:

Chun gur féidir leis an mBord Bainistíochta feidhmiú de réir an Achta Oideachais, 1998 agus de réir na reachtaíochta ábhartha eile agus taifead a choinneáil ar cheapacháin agus cinntí an Bhoird.

c) (Nósanna imeachta Suímh agus Slándála mar atá thuas):

4. Taifid eile: Creidiúnaithe

a) Catagóirí Sonraí Boird Bainistíochta:

Féadfaidh an scoil an fhaisnéis thíos nó cuid de a choinneáil mar gheall chreidiúnaithe (ar daoine féinhostaithe iad roinnt acu):

- ainm
- seoladh
- sonraí teagmhála
- uimhir PSP
- sonraí cánach
- sonraí bainc agus
- an méid a íocadh

b) Cuspóirí: Is é an cuspóir lena gcoinnítear taifid ar chreidiúnaithe ná:

Tá an fhaisnéis seo ag teastáil chun gnáthbhainistiú a dhéanamh agus cúrsaí airgeadais na scoile a riar lena n-áirítear sonraisc a íoc, cuntais airgeadais bhliantúla a thiomsú agus le haghaidh iniúchtaí agus fiosrúcháin na gCoimisinéirí Ioncaim.

c) (Nósanna imeachta Suímh agus Slándála mar atá thuas):

5. Taifid Eile: Foirmeacha aisghabhála cánach i leith carthanachta

a) Catagóirí Sonraí Boird Bainistíochta:

Féadfaidh an scoil na sonraí seo a leanas i leith deontóirí a thug deontais charthanachta don scoil a choinneáil:

- ainm
- seoladh
- uimhir theileafóin
- uimhir PSP
- ráta cánach
- síniú agus
- ollmhéid an deontais

b) Cuspóirí: Is iad na cuspóirí lena gcoinnítear taifid chreidiúnaithe ná:

Tá scoileanna i dteideal leas a bhaint as an scéim faoisimh cánach i leith deontas airgid a fhaigheann sí. Chun an faoiseamh a éileamh, ní mór don deontóir deimhniú (CHY2) a chomhlánú agus a sheoladh chuig an scoil chun go mbeidh sí in ann an cháin ollardaithe a bhaineann leis an deontas a éileamh. Is é an fhaisnéis atá le cur ag an tuismitheoir ar an deimhniú ná ainm, seoladh, uimhir PSP, ráta cánach, uimhir fóin, síniú agus ollmhéid an deontais. Coinníonn an scoil an fhaisnéis seo i gcás go ndéanfaidh na Coimisinéirí Ioncaim iniúchadh.

c) (Nósanna imeachta Suímh agus Slándála mar atá thuas):

ÍOMHÁNNA/TAIFEADTAÍ CCTV

Tá CCTV in Scoil Chrónáin. Tá ceamaraí mórthimpeall theorainn na scoile. Féadfaidh na córais CCTV íomhánna a thairfeadh den fhoireann, de dhaltaí agus de dhaoine den phobal a théann isteach ar thailte na scoile. Tá an stáisiún féachana i bpríomhoifig riaracháin na scoile. Monatóireacht á dhéanamh ar an CCTV tar éis am scoile agus ag an deireadh seachtaine chun foghlaithe a mhaolú.

Cuspóirí: Sábháilteacht agus slándáil foirne, daltaí agus cuairteoirí agus maoin agus trealamh na scoile a chosaint.

Slándáil:

Tá rochtain ar íomhánna/thairfeadtaí teoranta don Cathaoirleach, do Phríomhoide agus LeasPhríomhoide na scoile agus don fhear oibre de ghnáth. Coinnítear thairfeadtaí ar feadh 28 lá, ach i gcás go bhfuil siad ag teastáil chun eachtra a fhiosrú. Féadfar breathnú ar íomhánna/thairfeadtaí nó iad a chur ar fáil don Gharda Síochána de bhun na reachtaíochta Cosanta Sonraí. Tá fógra faoin tréimhse choinneála 28 lá ar taispeáint sa scoil.

TORTHAÍ SCRÚDUITHE

Ar na sonraí a choinneoidh an scoil, beidh torthaí scrúduithe daltaí lena n-áirítear torthaí lár téarma, torthaí bliantúla, torthaí measúnachta leanúnaí agus torthaí na dTástálacha Caighdeánaithe.

Cuspóirí:

Is é an príomhchuspóir atá le torthaí a choinneáil ná monatóireacht a dhéanamh ar dhul chun cinn an dalta agus bunús slán a bheith ann chun comhairle a chur air/uirthi agus ar a dtuismitheoir nó ar a gcaomhnóir faoina leibhéal gnóthachtála oideachais agus faoi mholtaí don todhchaí. Féadfaidh sonraí a chomhbhailiú chomh maith chun críocha staitisticí/tuairiscithe, mar tháblaí torthaí a thiomsú. Féadfar na sonraí a aistriú chuig an Roinn Oideachais agus Scileanna, an Chomhairle Náisiúnta Curaclaim agus Measúnachta agus scoileanna eile a n-aistríonn daltaí chucu.

Nósanna imeachta Suímh agus Slándála

Mar atá thuas

NAISC LE POLASAITHE EILE AGUS LE SOLÁTHAIR CURACLAIM

Ní mór go mbeidh ár bpolasaithe i gcomhréir a chéile laistigh de chreat phlean foriomlán na scoile. Scrúdófar polasaithe ábhartha scoile atá ann cheana féin nó atá á bhforbairt nó á n-athbhreithniú i dtaca leis an bPolasaí maidir le Cosaint Sonraí agus pléitear le haon impleachtaí atá ann dóibh.

I measc na bpolasaithe a fhéadfar a mheas tá:

- Nósanna Imeachta Cosanta Sonraí
- Polasaí Frithbhulaíochta
- Cód Iompair na Scoile
- Polasaí maidir le Rollú
- Polasaí maidir le hÚsáid Inglachtha
- Polasaí maidir le hOideachas Speisialta
- Polasaí maidir le Teagmhais Chriticiúla

PRÓISEÁIL DE RÉIR CHEARTA ÁBHAIR SONRAÍ

Déanfar sonraí a phróiseáil sa scoil seo de réir chearta an ábhair sonraí. Tá sé de cheart ag ábhair shonraí:

- Fios a bheith acu ar cé na sonraí pearsanta a bhaineann leo atá i seilbh na scoile
- Rochtain ar aon sonraí atá i seilbh rialaitheora sonraí a iarraidh

- Chosc a chur ar phróiseáil a gcuid sonraí chun margáíochta díri
- Iarraidh go leasófar sonraí míchruinne
- Iarraidh go scriosfar sonraí nuair nach gá a thuilleadh leo nó nuair atá siad neamhábhartha

Próiseálaithe sonraí

I gcás go gcuireann an scoil próiseáil sonraí amach ar Conradh Chuig Próiseálaí Sonraí Iasmuigh den scoil, is gá de réir an dlí go mbeidh conradh i scríbhinn ann (comhaontú seirbhíse tríú páirtí i scríbhinn). Sainítear na coinníollacha faoina bhféadfar na sonraí a phróiseáil, na coinníollacha slándála a ghabhann le próiseáil na sonraí agus na sonraí is gá a scriosadh nó a chur ar ais ar an gconradh a chríochnú nó a fhoirceannadh i gcomhaontú tríú páirtí Scoil Chrónáin.

Sáruithe i ndáil le sonraí pearsanta

Ní mór gach teagmhas ina gcuirtear sonraí pearsanta i mbaol a thuairisciú d'Oifig an Choimisiúin um Chosaint Sonraí laistigh de 72 uair má bhaineann riosca do dhaoine leis.

Nuair is dócha go mbaineann riosca ard do chearta agus saoirsí daoine nádúrtha leis an sárú i ndáil le sonraí pearsanta, ní mór don BB an sárú i ndáil le sonraí pearsanta a chur in iúl don ábhar sonraí gan mhoill mhíchuí. Ní dhéanfar teagmháil le daoine aonair ach i gcás go gcreideann an BB go bhfuil riosca ard ag baint leis an sárú don duine/na daoine i gceist. Má thugann an próiseálaí sonraí sárú i ndáil le sonraí pearsanta faoi deara, ní mór dó nó di é seo a thabhairt ar aird an rialaitheora sonraí (BB) gan mhoill mhíchuí.

Ag plé le hiarratas ar rochtain ar shonraí

Tá daoine aonair i dteideal cóip dá sonraí pearsanta a fháil ar iarratas i scríbhinn a dhéanamh nach mór é a fhreagairt laistigh de mhí. Féadfar go mbeidh síneadh ama ag teastáil, e.g. le linn tréimhsí saoire.

Ní féidir táille a ghearradh ach i gcúinsí eisceachtúla nuair a dhéantar iarrataí arís agus arís eile nó nuair atá siad gan bhunús nó iomarcach.

Ní féidir sonraí pearsanta a bhaineann le duine eile a chur ar fáil seachas iad siúd a bhaineann leis an ábhar sonraí.

FAISNÉIS A CHUR AR FÁIL AR AN BHFÓN

Ba cheart d'fhostaí a phléann le fiosrúcháin ar an bhfón a bheith cúramach faoi aon fhaisnéis phearsanta atá i seilbh na scoile a nochtadh ar an bhfón. Ba cheart, go háirithe, don fhostaí:

- Iarraidh ar an nglaoiteoir a (h)iarratas a chur i scríbhinn
- An t-iarraidh a chur ar aghaidh don Phríomhoide i gcásanna deacra
- Gan brú a mhothú faisnéis phearsanta a nochtadh

SOCRUITHE MAIDIR LE CUR I BHFEIDHM, RÓIL AGUS FREAGRACHTAÍ

Is é an BB an rialaitheoir sonraí agus is é an Príomhoide a chuireann an Polasaí maidir le Cosanta Sonraí i bhfeidhm, ag cinntiú go bhfuil tuiscint ag an bhfoireann a pheann le Sonraí Pearsanta nó a bhfuil rochtain acu orthu ar a bhfreagrachtaí cosanta sonraí.

Tá freagracht orthu seo a leanas as an bPolasaí maidir le Cosanta Sonraí:

An Bord Bainistíochta: Rialaitheoir Sonraí

Príomhoide: An Polasaí a chur i bhFeidhm

DAINGNIÚ & CUMARSÁID

Daingnithe ag an mBord Bainistíochta i **Mí _____ 20__** gus sínithe ag an gCathaoirleach.

Rinne an rúnaí taifead ar an daingniú i miontuairiscí an chruinnithe.

MONATÓIREACHT AR CHUR I BHFEIDHM AN PHOLASÁÍ

Déanfaidh an Príomhoide, an fhoireann agus an Bord Bainistíochta monatóireacht ar chur i bhfeidhm an pholasaí.

ATHBHREITHNITÚ AGUS MEASTÓIREACHT A DHÉANAMH AR AN BPOLASÁÍ

Déanfar athbhreithniú agus meastóireacht ar an bpolasaí tar éis 2 bhliain. Agus athbhreithniú agus meastóireacht á ndéanamh, tabharfar aird ar eolas agus treoirlínte athraithe (e.g. ón gCoimisiún um Chosaint Sonraí, an Roinn Oideachais agus Scileanna nó Tusla), reachtaíocht agus aiseolas ó thuismitheoirí/caomhnóirí, daltaí, foireann na scoile agus daoine eile. Leasófar an polasaí de réir mar is gá de réir an athbhreithnithe agus na meastóireachta sin laistigh agus an chreat pleanála scoile.

Sínithe:

Le haghaidh agus thar cheann an Bhoird Bainistíochta

Dáta: Daingnithe

Aguisín 1 Scoil Chrónáin

Tréimhsí Cosanta Sonraí do Scoileanna

<i>Bainteach le páiste</i>	<i>Tréimhsí Coinneála</i>
Clár na Scoile/Leabhair Rolla Foirmeacha Rollaithe Nótaí asláithreachta Torthaí tástálacha – Caighdeánaithe Measúnachtaí síceolaíochta, etc. Comhaid Riachtanas Oideachais Speisialta/ Pleananna Oideachais don Dalta Aonair Tuiriscí ar Thimpistí Tuarascálacha/Taifid Cosanta Leanaí Achomhairc Alt 29	Tréimhse éiginnte Le coinneáil go dtí go slánaíonn an dalta is óige sa rang 25 bliain d’aois. Ní scriosfar go deo iad Le coinneáil go dtí go slánaíonn an dalta is óige sa rang 25 bliain d’aois. Ní scriosfar go deo iad Ní scriosfar go deo iad Ní scriosfar go deo iad Ní scriosfar go deo iad Ní scriosfar go deo iad
<i>Taifid Agallamh</i>	
Bord agallaimh Scéim mharcála Nótaí an Bhoird Bainistíochta (i dtaobh iarratasóirí nár éirigh leo)	18 mí ó dhúnadh an chomórtais móide 6 mhí i gcás go mbeidh ar an mBinse Comhionannais fógra a thabhairt don scoil go bhfuil éileamh á dhéanamh
<i>Taifid Foirne</i>	
Conradh fostaíochta Clárú leis an gComhairle Múinteoireachta Taifid ghrinnfhiosrúcháin Tuiriscí ar thimpiste/gortú ag an obair	Fad na fostaíochta + 7 mbliana (6 bliana chun éileamh a dhéanamh i gcoinne na scoile móide bliain amháin chun imeachtaí a sheirbheáil ar an scoil)
<i>Taifid BB</i>	
Cláir agus miontuairiscí BB Taifeadtaí CCTV Párolla & Cáin Sonraisc/admhálacha	Tréimhse éiginnte 28 lá de ghnáth. I gcás imscrúdaithe chóiriúil – chomh fada agus is gá Ceanglaíonn na Coimisinéirí loncainm go gcoinnítear faisnéis ar feadh 6 mhí tar éis dheireadh na bliana cánach 7 mbliana ó dheireadh na tréimhse

Cuntais iniúchta	cuntasáochta Tréimhse éiginnte
<p><i>Cén fáth go molann an Coimisiún um Chosaint Sonraí, i gcúinsí áirithe, go gcoinnítear taifid go dtí go bhfuil 25 bliain d'aois slánaithe ag an iardhalta?</i></p> <p>Is é an réasúnaíocht ná go dtagann an dalta i lán-aois nuair a slánaíonn sé/sí 18 bliana d'aois agus ba chóir go mbeadh tréimhse teorann de 6 bliana ann ar lena linn is féidir éileamh a dhéanamh i gcoinne na scoile, móide bliain amháin chun imeachtaí a sheirbheáil ar an scoil. Tá teorainn ar an gceart caingne faoi Reachta na dTréimhsí sa chaoi is go bhfuil cosc ama ar aon chaingean a dhéanamh tar éis tréimhse fhorordaithe.</p>	

DATA PROTECTION POLICY (2020)

INTRODUCTORY STATEMENT

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

The policy applies to all school staff, the Board of Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school) insofar as the 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.

Scoil Chrónáin 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

- be able to provide access to individuals to their data
- ensure it is held securely
- document our data protection procedures
- enhance accountability and transparency

DATA PROTECTION PRINCIPLES

The school BoM is a data controller of personal data relating to its past, present and future staff, students, parents/guardians and other members of the school community. As such, the BoM is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 to 2018 and GDPR, which can be summarised as follows:

1. *Obtain and process Personal Data fairly*

Information on students is gathered with the help of parents/guardians and staff. Information is also transferred from their previous schools. In relation to information the school holds on other individuals (members of staff, individuals applying for positions within the School, parents/guardians of students, etc.), the information is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with the School. All such data is treated in accordance with the Data Protection legislation and the terms of this Data Protection Policy. The information will be obtained and processed fairly. Recording of teachers and SNAs during meetings in Scoil Chrónáin is prohibited. All mobile media such as mobile phones, iPads etc. must be switched off during meetings.

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 an unambiguous indication of the data subject's wishes. Scoil Chrónáin will require a clear, affirmative action e.g. ticking of a box/signing a document to indicate consent. Consent can be withdrawn by data subjects in these situations. Some records held by Scoil Chrónáin are for the purpose of complying with its statutory obligations and public task. In those circumstances, the consent of the data subject is not required.

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

The BoM is obliged to inform individuals of the reasons it collects 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. Data will only be shared with 3rd parties as appropriate.

5. *Keep Personal Data safe and secure*

Only those with a genuine reason for doing so may gain access to the information. The BOM, principal, deputy principal, assistant principal, secretary, care taker and the parent's council have access to data as appropriate to their roles. Where appropriate 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*

Students, parents/guardians, and/or staff should inform the school of any change which the school should make to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records. Records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation will 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. The data is retained in filing cabinets in classrooms, in learning support rooms in both the Principal's and the secretary's offices and in two specifically, designated storage areas. See appendix 1 for Data Retention Periods for Schools. It is the school's responsibility to destroy the data on expiry of the retention period.

9. *Provide a copy of their personal data to any individual on request*

Individuals have a right to have access to a copy of personal data held about them, and to know by whom and the purpose for which it is held. It is the School's responsibility, namely the Principal's, to provide this data if requested.

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, students and their parents/guardians how their data will be treated.

The policy applies to all school staff, the Board of Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians, and applicants for staff positions within the school) insofar as the school handles or processes their Personal Data in the course of their dealings with the school.

Definition of Data Protection Terms

In order to properly understand the school's obligations, there are some key terms, which should be understood by all relevant school staff:

Personal Data means any data relating to an identified or identifiable natural person, i.e. a living individual who is or can be identified either from the data or from the data in conjunction with other

information that is in, or is likely to come into, the possession of the Data Controller (BoM)

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. Scoil Chrónáin uses the Data Processor Aladdin.

Special categories of Personal Data refer 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 (see appendix 1 data retention period) and with whom it will be shared. The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the Principal and Board of Management to make decisions in respect of the efficient running of the School. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and Board of Management.

OTHER LEGAL OBLIGATIONS

Implementation of this policy takes into account the school's other legal obligations and responsibilities. Some of these are directly relevant to data protection. *For example:*

Under Section 9(g) of the Education Act, 1998, the parents of a student, or a student who has reached the age of 18 years, must be given access to records kept by the school relating to the progress of the student in their education.

Under Section 20 of the Education (Welfare) Act, 2000, the school must maintain a register of all students attending the School.

Under Section 20(5) of the Education (Welfare) Act, 2000, a Principal is obliged to notify certain information relating to the child's attendance in school and other matters relating to the child's educational progress to the Principal of another school to which a student is transferring. Scoil Chrónáin sends, by post, a copy of a child's Education 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 Scoil Chrónáin staff, are included in current pupil files, such reports are only passed to the Post-Primary school following express written permission having been sought and received from the parents of the said pupils.

Under Section 21 of the Education (Welfare) Act, 2000, the school must record the attendance or non-attendance of students registered at the school on each school day.

Under Section 28 of the Education (Welfare) Act, 2000, the School may supply Personal Data kept by it to certain prescribed bodies (the Department of Education and Skills, Tusla, the National Council for Special Education and other schools). The BoM must be satisfied that it will be used for a 'relevant purpose' (which includes recording a person's educational or training history or monitoring their educational or training progress; or for carrying out research into examinations, participation in education and the general effectiveness of education or training).

Under Section 14 of the Education for Persons with Special Educational Needs Act, 2004, the school is required to furnish to the National Council for Special Education (and its employees, which would include Special Educational Needs Organisers) such information as the Council may from time to time reasonably request.

The Freedom of Information Act 1997 provides a qualified right to access to information held by public bodies which does not necessarily have to be 'personal data', as with data protection legislation. While most schools are not currently subject to freedom of information legislation, (with the exception of schools under the direction of Education and Training Boards), if a school has furnished information to a body covered by the Freedom of Information Act (such as the Department of Education and Skills, etc.) these records could be disclosed by that body if a request is made to that body.

Under Section 26(4) of the Health Act, 1947 a School shall cause all reasonable facilities (including facilities for obtaining names and addresses of pupils attending the school) to be given to a health authority who has served a notice on it of medical inspection, e.g. a dental inspection.

Under *Children First Act 2015*, mandated persons in schools have responsibilities to report child welfare concerns to TUSLA- Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

RELATIONSHIP TO ETHOS OF THE SCHOOL:

Scoil Chrónáin seeks to:

- enable students to develop their full potential
- provide a safe and secure environment for learning

- promote respect for the diversity of values, beliefs, traditions, languages and ways of life in society

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
- Medical data for staff

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 Scoil Chrónáin:

- 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.

- Digital records are stored on password-protected computer with adequate encryption and firewall software in a locked office.

2. *Student records:*

a) Categories of student data:

These may include:

- Information which may be sought and recorded at enrolment and may be collated and compiled during the course of the student's time in the school. These records may include:
 - name, address and contact details, PPS number
 - date and place of birth
 - names and addresses of parents/guardians and their contact details (including any special arrangements with regard to guardianship, custody or access)
 - religious belief
 - racial or ethnic origin
 - membership of the Traveller community, where relevant
 - whether they (or their parents) are medical card holders
 - whether English is the student's first language and/or whether the student requires English language support
 - any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply
- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements) are managed in line with the accompanying policy on school photography.
- Academic record – subjects studied, class assignments, examination results as recorded on official School reports
- Records of significant achievements
- Records of disciplinary issues/investigations and/or sanctions imposed
- Other records e.g. record 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. These records will be stored in a fire proof cabinet. Examples of these documents are the Child Protection Oversight Reports and the Case File Documents.

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 students can benefit from the relevant additional teaching or financial supports
- to support the provision of religious instruction
- to enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or to inform parents of school events, etc.
- to meet the educational, social, physical and emotional requirements of the student
- photographs and recorded images of students are taken to celebrate school

achievements, e.g. compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school. Such records are taken and used in accordance with the school's 'Privacy Notice to Parents/Guardians'

- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirement for attendance at Primary School.
- to furnish documentation/information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other schools, etc. in compliance with law and directions issued by government departments
- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to second-level educational institutions.

c) (Location and Security procedures as above):

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 Board of Management data:

The school may hold some or all of the following information about creditors (some of whom are self-employed individuals):

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

b) Purposes: The purposes for keeping creditor records are:

This information is required for routine management and administration of the school's financial affairs, including the payment of invoices, the compiling of annual financial accounts and complying with audits and investigations by the Revenue Commissioners.

c) (Location and Security procedures as above):

5. *Other Records: Charity Tax-back Forms*

a) Categories of Board of Management data:

The school may hold the following data in relation to donors who have made charitable

donations to the school:

- name
- address
- telephone number
- PPS number
- tax rate
- signature and
- the gross amount of the donation.

b) Purposes: The purposes for keeping creditor records are:

Schools are entitled to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY2) and forward it to the school to allow it to claim the grossed-up amount of tax associated with the donation. The information requested on the appropriate certificate is the parents' name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the School in the event of audit by the Revenue Commissioners.

c) (Location and Security procedures as above):

CCTV IMAGES/RECORDINGS:

CCTV is installed in Scoil Chrónáin. There are cameras in placed around the perimeter of the school. These CCTV systems may record images of staff, students and members of the public who visit the premises. The viewing station is in the main school administration office.

CCTV monitored after school hours and weekends to mitigate against trespassers.

Purposes:

Safety and security of staff, students and visitors and to safeguard school property and equipment.

Security:

Access to images/recordings is generally restricted to the Chairperson, Principal, Deputy Principal of the school and the school caretaker. 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. A notification of this 28-day retention period is displayed in the school.

EXAMINATION RESULTS

The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual and continuous assessment results and the results of Standardised Tests.

Purposes:

The main purpose for which these examination results are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardian about educational attainment levels and recommendations for the future. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and other schools to which pupils move.

Location and Security procedures: 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 policies may be among those considered:

- Child Protection Procedures
- Anti-Bullying Policy
- Code of Behaviour
- Enrolment Policy
- ICT Acceptable Usage Policy
- Assessment Policy
- Special Educational Policy
- Critical Incident Policy

PROCESSING IN LINE WITH A DATA SUBJECT'S RIGHTS

Data in this school will be processed in line with the data subject's rights. Data subjects have a right to:

- Know what personal data the school is keeping on them
- Request access to any data held about them by a data controller
- Prevent the processing of their data for direct-marketing purposes
- Ask to have inaccurate data amended
- Ask to have data erased once it is no longer necessary or irrelevant.

Data Processors

Where the school outsources to a data processor off-site, it is required by law to have a written contract in place (Written Third party service agreement). Scoil Chrónáin's third party agreement specifies the conditions under which the data may be processed, the security conditions attaching to the processing of the data and that the data must be deleted or returned upon completion or termination of the contract.

Personal Data Breaches

All incidents in which personal data has been put at risk must be reported to the Office of the Data Protection Commission within 72 hours if the breach presents a risk to individuals.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the BoM must communicate the personal data breach to the data subject without undue delay. Individuals will only be contacted if the BOM believes the breach is of high risk to the person/people in question. If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (BoM) without undue delay.

Dealing with a data access request

Individuals are entitled to a copy of their personal data on written request, which must be responded to within one month. An extension may be required e.g. over holiday periods. No fee may be charged except in exceptional circumstances where the requests are repetitive or manifestly unfounded or excessive

No personal data can be supplied relating to another individual apart from the data subject

PROVIDING INFORMATION OVER THE PHONE

An employee dealing with telephone enquiries should be careful about disclosing any personal information held by the school over the phone. In particular, the employee should:

- Ask that the caller put their request in writing
- Refer the request to the Principal for assistance in difficult situations
- Not feel forced into disclosing personal information

IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES

The BoM is the data controller and the Principal implements the Data Protection Policy, ensuring that staff who handle or have access to Personal Data are familiar with their data protection responsibilities

The following have responsibility for the Data Protection Policy:

Board of Management: Data Controller

Principal: Implementation of Policy

RATIFICATION & COMMUNICATION

Ratified at the Board of Management in 202 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 after 2 years. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commission, Department of Education and Skills or TUSLA), legislation and feedback from parents/guardians, students, school staff and others. The policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning

Signed:

For and behalf of Board of Management

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Date: Ratified