

# St. Patrick's Classical School



## Data Protection Policy

March. 2019

## School Mission Statement

The mission of St. Patrick's Classical School is to educate its students according to the best traditions and highest standards of Catholic schooling.

It endeavours at all times to provide, through as wide, as varied and as balanced a curriculum as is possible, for the spiritual, intellectual, emotional, social, cultural and moral development of all its students.

St. Patrick's Classical School strives for excellence in all aspects of culture, including sport, drama and music, wherein students are challenged and encouraged to realise their full potential as human beings.

As partners in this education process the Board of Management, Principal, Deputy-Principals, Staff and Parents are also conscious of the importance of encouraging the growth of positive behaviour, the development of leadership skills and the meaningful understanding of all aspects of living with regard to citizenship, family, work and leisure.

Further, we believe that all aspects of school life should be lived in a spirit of justice and charity and that Christian selflessness should be an integral part of our dealings with one another

## Introduction

The school's Data Protection Policy applies to the personal data held by the school which is protected by the General Data Protection Regulation and the Data Protection Act 2018.

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 sensitive personal data will be protected by the school.

## Definitions of Data Protection

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

**Processing** means 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.

**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 structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

**Data Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; for the purpose of this policy is the board of management and the principal of St. Patrick's Classical School.

**Data Processor** 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

**Personal Data** personal data' means any information relating to an identified or identifiable natural person ('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.

**Special Category 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.

## Data Protection Principles

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. As such, the school is obliged to comply with the principles of data protection set out in the General Data Protection Regulation which can be summarised as follows:

- **Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')**: for information to be processed fairly data subjects should be provided with certain information at the time which the personal data is obtained. It is the school's policy to do so by setting out the relevant information in an appropriately worded Data Privacy Statement and provide this to the data subjects on collection of the data.
- **Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes**: The School will not collect personal data without having a clear, sound and legitimate reason for doing so. The reasons for collecting personal data are laid out in this Data Protection Policy and our Data Privacy Statement.

- **Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')**: data which is collected and kept relating to individuals is periodically reviewed to ensure compliance with this requirement, information which is no longer needed is deleted in accordance with the Monitoring Compliance section in this policy. Data will only be processed in a manner consistent with the purposes for which it was gathered.
- **Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')**: the school seeks to ensure that all personal data that is held is accurate and up to date. The school will monitor this by ensuring a periodic review of all personal data is completed in accordance of our Monitoring Compliance section in this policy. Any personal data that is incorrect will be erased or rectified without delay.
- **Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')**; the schools Retention Policy outlines the details of the periods of which the school retains the various categories of data held. 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.
- **Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')**: only those with a genuine reason for doing so may gain access to all personal data. Access to the school's IT systems that hold personal data are subject to security and acceptable use policies which outline the responsibilities when using these systems.

**The controller shall be responsible for, and be able to demonstrate compliance with the above principals ('accountability').**

## **Lawful basis for processing**

The overall aims of this policy are:

- 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.

The General Data Protection Regulation states that there must be a valid lawful basis in order to process personal data, both automated and manual. There are six lawful bases as follows:

- Consent
- Necessary for the performance of a contract or the provision of a service
- Necessary in relation to a legal obligation
- Necessary in the vital interests of the data subject
- Necessary for a task carried out in the public interest or in the exercise of official authority
- Necessary for the purposes of a legitimate interest unless overridden by the rights and freedoms of the data subject.

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared.

The school takes its responsibilities under the General Data Protection Regulation 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.

## Relationship of Data Protection Policy to the Characteristic Spirit of the School

St. Patricks Classical School aims to:

- enable each student to develop their full potential
- provide a safe and secure environment for learning
- promote respect for the diversity of values, beliefs, traditions, languages and ways of life in society.

We set out to achieve these aims while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us. The school wishes to achieve these aims/missions while fully respecting individuals' rights to privacy and rights under the Data Protection Acts.

## Personal Data

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

### A. Staff Records:

- I. **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*
- *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).*

**2. 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. 2015.*
- *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.*

**3. Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access, also stored on a database.*

**4. Security:** *The format in which these records will be kept are a manual record (personal file within filing system, stored under lock and key) and computer record (database which is protected with firewall software and password protection.*

## B. Student Records:

### I. **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) See Appendix I*
- *Academic record – subjects studied, class assignments, examination results as recorded on official School reports*
- *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. (Note: it is advisable to inform parents that a particular incident is being recorded).*
- *Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).*

### 2. **Purposes:** The purposes for keeping student records are:

- *to enable each student to develop to their 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, 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 "Guidance for Taking and Using Images of Pupils in Schools"*
  - *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 Irish meets the criteria in order to obtain such an exemption from the authorities*
  - *to furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other Schools etc. in compliance with law and directions issued by government departments*
  - *to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/ references to third-level educational institutions and/or prospective employers*
  - *In respect of a work experience placement, (where that work experience role requires that the student be Garda vetted) the School will assist the student in obtaining their Garda vetting outcome (with the consent of the student and their parent/guardian) in order to furnish a copy of same (with the consent of the student and the student's parent/guardian) to the work experience employer.*
3. **Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access, also held on a database.*
4. **Security:** *The format in which these records will be kept are a manual record (personal file within filing system, stored under lock and key) and computer record (database which is protected with firewall software and password protection.*

### **C. Board of Management Records:**

1. **Categories of Board of management data:** These may include:
- *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 particular individuals.*
2. **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.*



3. **Location:** *In a secure, locked filing cabinet and that only personnel who are authorised to use the data can access it. Employees are required to maintain the confidentiality of any data to which they have access.*
4. **Security:** *The format in which these records will be kept are a manual record (Personal File within filing system, stored under lock and key) and computer record database which is protected with firewall software and password protection*

#### D. Other Records:

The school will hold other records relating to individuals. The format in which these records will be kept are manual record (personal file within a relevant filing system), and/or computer record (database). Some examples of the type of other records which the school will hold are set out below (this list is not exhaustive):

#### Creditors

1. **Categories of 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*
2. **Purposes:** *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.*
3. **Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.*
4. **Security:** *The format in which these records will be kept are a manual record (Personal File within filing system, stored under lock and key) and computer record database which is protected with firewall software and password protection.*

#### Charity Tax-Back Forms

1. **Categories of 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.*
2. **Purposes:** *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 case of audit by the Revenue Commissioners.*
  3. **Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.*
  4. **Security:** *The format in which these records will be kept are a manual record (Personal File within filing system, stored under lock and key) and computer record database which is protected with firewall software and password protection.*

### **CCTV Images/Recordings**

1. **Categories:** *CCTV is installed in St. Patrick's Classical School, externally i.e. perimeter walls/fencing and internally. These CCTV systems may record images of staff, students and members of the public who visit the premises.*
2. **Purposes:** *Safety and security of staff, students and visitors and to safeguard school property and equipment.*
3. **Location:** *Cameras are located externally and internally on the corridors. There are no camera's in bathrooms and/or changing room. Recording equipment is located in the Principal's and Deputy Principal's office.*
4. **Security:** *Access to images/recordings is restricted to the Principal, Deputy Principal's and other teachers who are requested to identify students/parents etc. tapes, DVDs, hard disk 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 the General Data Protection Regulation.*

### **Examination Results**

1. **Categories:** *The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual, continuous assessment and mock-examinations results. All state examination results are held by the Department of Education and Skills.*

2. **Purposes:** *The main purpose for which these examination results and other records are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about subject choices and levels. 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 such other similar bodies.*
3. **Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.*
4. **Security:** *The format in which these records will be kept are a manual record (personal file within filing system, stored under lock and key) and computer record (database which is protected with firewall software and password protection).*

### **October Returns**

1. **Categories:** *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](http://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](http://www.education.ie) (search for Circular Letter 0047/2010 in the "Circulars" section).*
2. **Purposes:** *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. The main purpose of the October Returns is for the DES to determine whether the student qualifies for English language support and/or additional resources and support to meet their particular educational needs. The October Returns are submitted to the DES electronically. The DES has their own policy governing the security of the data sent to them by all post-primary schools. The co-operation of each student and/or their parents/guardians in completing the October Return is greatly appreciated as the*

*school's aim is to ensure that each student is assisted in every way to ensure that s/he meets his/her full potential.*

3. **Location:** *In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.*
4. **Security:** *Identify the format in which these records are kept e.g. manual record (personal file within a relevant filing system), computer record (database) or both. The format in which these records will be kept are a manual record (personal file within filing system, stored under lock and key) and computer record (database which is protected with firewall software and password protection).*

## Data Subject's Rights

Data subjects have a right to:

- 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
- Prevent processing that is likely to cause damage or distress to themselves or anyone else.

Data subjects are given stronger rights under the General Data Protection Regulation.

- **Right to rectification** – Data subjects have the right to request that their data is rectified if it is inaccurate or incomplete. The school must respond within one month, or two months if the request is complex. If the request is declined, the school must explain why to the data subject, informing the individual of their right to complain to the Data Protection Commission and to a judicial remedy.
- **Right to erasure** –It enables a data subject to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- **Right to object** – Data subjects can object to the processing of their data, for example, in relation to direct marketing, profiling, scientific and historical research.
- **Right to restrict processing** – Data subjects have the right to require that a data controller restricts its processing of their data in some circumstances and have the right to object to the processing of their data in some circumstances.
- **Right to data portability** – The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided

## Dealing with Data Access Requests

The General Data Protection Regulation states that individuals have a right to obtain:

- Confirmation that their data is being processed, access to their personal data and the following information.

- The purpose of the processing
- The categories of personal data
- Recipients of the data
- Source of the data
- Period of storage
- International transfers

Data subjects are entitled to a copy of their personal data on written request, email is also sufficient.

- The school hold the right to confirm the identity of the individual making the Subject Access Request. If the school is not satisfied with the identification of the individual making the request, the school will ask the individual to provide more information, such as a date of birth, a passport or a birth certificate. The school also has the right to refuse a Subject Access Request if the individual fails to provide identification.
- The timescale for compliance with Subject Access Requests is one month. This period may be extended by a further two months where requests are complex or numerous.
- Individuals will not be charged a fee for the provision of copies of records. However, the General Data Protection Regulation outlines that a “reasonable fee” may be charged when a request is “manifestly unfounded or excessive”, particularly if it is repetitive.
- If a Subject Access Request is made electronically, the information will be provided in a commonly used electronic format, unless otherwise specified.
- If the school declines to comply with a Subject Access Request, on the grounds that the request is “manifestly unfounded or excessive”, then the patient must be provided with a reason and be informed of their right to make a complaint to the Data Protection Commission.

## Data Breach Notification

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. It may be accidental or deliberate.

Under the GDPR, breach notification will be mandatory where a data breach is likely to “result in a risk to the rights and freedoms of individuals”.

- Such data breaches must be notified to the Data Protection Commission without undue delay and in any event within 72 hours of first having become aware of the breach. If the breach affects individuals in different EU countries, the school should identify the relevant supervisory authority.
- When reporting a breach to the DPC, the school must provide the following:
  - A description of the nature of the personal breach
  - The categories and approximate number of individuals and personal data records concerned
  - Name and contact details of the schools Data Protection Officer (DPO)
  - A description of the likely consequences of the personal data breach
  - A description of the measures taken, or proposed to be taken, to deal with the personal data breach, including any measures to reduce the impact of the breach.

- Data processors will be required to notify the data controllers, “without undue delay” after first becoming aware of a data breach.
- Records of all data breaches are retained on the school’s internal data breach log, regardless whether they are required to be notified to the Data Protection Commission.

## Providing Information over the Phone

In our school, any 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:

- Check the identity of the caller to ensure that information is only given to a person who is entitled to that information
- Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified
- Refer the request to the principal for assistance in difficult situations. No employee should feel forced into disclosing personal information.

## Implementation Arrangements, Roles and Responsibilities

In our school, the Board of Management and the Principal serve as the school’s Data Controller and the Principal will be assigned the role of co-ordinating the implementation of this Data Protection Policy and for ensuring that staff who handle or have access to *Personal Data* are familiar with their data protection responsibilities. The Principal and Deputy Principal are appointed as the schools Data Protection Officer.

The following personnel have responsibility for implementing the Data Protection Policy:

<b><i>Name</i></b>	<b><i>Responsibility</i></b>
<i>Board of management:</i>	<i>Data Controller, awareness of responsibilities</i>
<i>Principal/Deputy Principals:</i>	<i>Data Controller, implementation of policy, awareness of responsibilities</i>
<i>Teaching personnel:</i>	<i>Awareness of responsibilities, security, confidentiality</i>
<i>Administrative personnel:</i>	<i>Awareness of responsibilities, security, confidentiality</i>
<i>IT personnel:</i>	<i>Security, encryption, confidentiality</i>

## Compliance Monitoring

The school has policies and procedures in place to ensure it can demonstrate compliance with the General Data Protection Regulation. The implementation of these policies and procedures shall be monitored by the principal and the Board of Management.

At least one annual report will be issued to the Board of Management to confirm that the actions set down under the policies and procedures are being implemented.

The school maintains a data inventory of all the personal data it holds. The inventory includes the following details:

- What personal data is collected and processed by the school
- Where personal data is stored
- How long personal data is kept for
- Mapping where data goes from point of collected, throughout the organisation and externally to third parties if applicable.

The school's data inventory is maintained by the Data Protection officer and reviewed on a periodic basis.

## **Ratification and Communication**

When the Data Protection Policy has been ratified by the board of management, it becomes the school's agreed Data Protection Policy. It will be then dated and circulated within the school community. The entire staff must be familiar with the Data Protection Policy and ready to put it into practice in accordance with the specified implementation arrangements. It is important that all concerned are made aware of any changes implied in recording information on students, staff and others in the school community.

Parents/guardians and students will be informed of the Data Protection Policy from the time of enrolment of the student e.g. by including it on our website or by either enclosing it or incorporating it as an appendix to the enrolment form.

- The board of management officially ratified the policy on 7<sup>th</sup> of March 2019.
- The policy will be communicated to the parent body through the Parents Council and Flexibuzz, the staff through staff meetings/emails, student body at assemblies and at incoming parent's evenings.

## **Complaints**

If you are dissatisfied with the decision of the school's Data Protection Officer, you have the right to complain to the Data Protection Commission.

## **Reviewing and Evaluating the Policy**

The policy will be reviewed and evaluated annually and as necessary by the schools appointed Data Protection Coordinator. On-going review and evaluation should take cognisance of changing information or guidelines (e.g. from the Data Protection Commission, Department of Education and Skills or the NEWB), 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.

## **Training**

The school ensures to provide all staff with Data Protection training on an annual basis, with refresher training provided if needed. All staff joining the school for the first time will be provided with Data Protection training.

## **Contact**

If you have any queries in relation to the schools Data Protection Policy or wish to exercise any of your rights under the General Data Protection Regulation and Data Protection Act 2018, please contact the schools Data Protection Officer.

Email: [office@stpatcs.com](mailto:office@stpatcs.com)

Telephone: 046-9023772



### **Ratification**

This policy was ratified by the Board of Management at its meeting of 7<sup>th</sup> of March 2019

Signed: *Mr B Kennedy* (Chairperson)

Next review date 2020