Gaelscoil



Átha Í

Polasaí um Chosaint Sonraí

Gaelscoil Áchaí

POLASAÍ UM CHOSAINT SONRAÍ

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POLASAÍ UM CHOSAINT SONRAÍ

1. RÉAMHRÁ

Baineann an polasaí seo le ***sonraí*** pearsanta a choinnítear ag Bord Bainistíochta na scoile, a bhfuil cosaint air faoi Achtanna um Chosaint Sonraí 1988 – 2018 agus faoin Dlí Cosanta Sonraí Ginearálta (GDPR).
Baineann an polasaí seo le gach ball foirne, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus le héinne eile a roinneann sonraí (daltaí réamhchláraithe agus a dtuismitheoirí/gcaomhnóirí agus iarrthóirí ar phoist scoile san áireamh) sa mhéad is a bhaineann ábhar an pholasaí leo. Coinneofar na sonraí a roinntear linn go daingean, ionas go mbeidh cosaint á déanamh ar shonraí faoi iontaoibh de réir na ndlithe cuí. Leagann an polasaí seo amach conas a dhéanfar sonraí pearsanta agus sonraí pearsanta íogaireach a chosaint sa scoil.

Tá cur chuige "Príobháideachas d'Aon Ghnó ag Gaelscoil Átha Í i leith chosaint sonraí. Ciallaíonn sé seo go ndéantar pleanáil chúramach agus sonraí á mbailiú againn chun prionsabail chosaint sonraí a bheith mar chuid lárnach d'oibríochtaí sonraí. Déantar iniúchadh ar na sonraí a choinnítear chun:

1. A bheith in ann a sonraí féin a chur ar fáil do dhaoine
2. A chinntiú go gcoinnítear na sonraí sin go daingean
3. Cur síos a dhéanamh ar na beartais um chosaint sonraí sa scoil
4. Cur le cuntasacht agus le follasacht

2. PRIONSABAIL CHOSAINT SONRAÍ

Tá Bord Bainistíochta na scoile mar *rialaitheoir sonraí* ar *shonraí pearsanta a* bhaineann le baill reatha, caite agus todhchaí, daltaí, tuismitheoirí/caomhnóirí agus baill eile de phobal na scoile. Mar sin, is gá don Bhord Bainistíochta cloí le prionsabail um chosaint sonraí mar a leagtar amach sna Dlíthe um Chosaint Sonraí 1988 – 2018 agus sa GDPR. Sonraíonn na prionsabail seo go mbeidh sonraí:

a) ***Próisithe go cothrom agus go dleathach***

Bailítear eolas faoi dhaltaí le cabhair na dtuismitheoirí/gcaomhnóirí agus baill foirne. Faightear eolas ó scoileanna eile ar ar fhreastail siad chomh maith. Maidir le sonraí a bhíonn ag an scoil ó dhaoine eile (baill foirne, iarrthóirí ar phoist sa scoil, tuismitheoirí/caomhnóirí na ndaltaí, srl.), tugtar an t-eolas seo le cead aitheanta agus bailítear é le linn na tréimhse fostaíochta. Caithtear leis an eolas seo go léir de reir dlíthe Chosaint Sonraí agus sonraí an pholasaí seo. Bailítear agus déantar próiseáil ar an eolas seo ar bhealach cothrom.

b) ***Ceadaithe***

Nuair a bhíonn cead de dhíth chun sonraí a bhailiú (m.sh. sonraí chun a bheith mar bhall d'fhoireann spóirt/d'imeachtaí iar-scoile, srl.) is gá an cead seo a fháil ar bhealach sonrach, cinnte de réir tola an ábhair sonraí. Beidh gníomh soiléir, dearfach de dhíth ó Ghaelscoil Átha Í, m.sh. ag cur tic i mbosca nó ag síniú doiciméid, chun cead a léiriú. Is féidir le hábhair sonraí cead a aistharraingt sna cásanna seo.

c) Coinnithe ar chúiseanna sainráite agus dleathacha

Cuirfidh an Bord Bainistíocht in iúl do dhaoine an chúis a bhaineann le bailiú na sonraí áirithe agus an leas a bhainfear astu. Coinneofar an t-eolas uile ar leas an ábhair sonraí i gcónaí.

d) Úsáidte agus nochtaithe i mbealaí atá comhoiriúnacha leis na feidhmeanna seo

Déanfar sonraí a bhaineann le daoine aonair a phróiseáil ar bhealach comhoiriúnach leis an bhfeidhm bailithe. Scaoilfear le sonraí ar bhealach "gá le fios" amháin, agus ní roinnfear an t-eolas gan feidhm.

e) Coinnithe go sábháilte agus go daingean

Ní féidir ach leo siúd le gá sonraí pearsanta a fháil. Coinnítear sonraí pearsanta faoi ghlas i gcás sonraí scríofa agus i gcás sonraí leictreonacha, coinnítear iad ar ríomhairí le bogearraí slándála agus pasfhocail. Bíonn cosaint pasfhocail ar ghléasanna soghluaiste.

f) Coinnithe go beacht, comhlán agus reatha

Ba chóir go gcuireadh daltaí, tuismitheoirí/caomhnóirí, agus baill foirne in iúl don scoil más gá leasú a dhéanamh ar a gcuid sonraí pearsanta nó ar shonraí íogaireacha chun a bheith cinnte go bhfuil an t-eolas cruinn, comhlán agus reatha. Athróidh an scoil ansin na taifid chuí. Ní féidir taifid a athrú nó a scrios gan an chead cuí. Más gá leasú a dhéanamh, ba chóir síniú an duine a fháil ar athrú ar an mbunchóip de na sonraí.

g) Leordhóthanach, ábhartha agus gan a bheith iomarcach

Ní bhaileofar agus ní choinneofar ach an méid eolais gur ghá chun seirbhís chuimsitheach a chur ar fáil.

h) Coinnithe don tréimhse sainchuspóra amháin nó chun freastal ar a bhfeidhm a bhain leis an mbailiú

Go ginearálta, coinnítear an t-eolas do thréimhse an duine sa scoil. Ina dhiaidh sin, leanfar treoirlínte na Roinne Oideachais agus Scileanna maidir le coinneáil sonraí i leith daltaí. I gcás bhall foirne,cloífear le treoirlínte and ROS agus na Coimisinéirí Ioncain maidir le coinneáil taifid ar fhostaithe. Coinneoidh an scoile sonraí ar feadh treimhse níos faide de réir na ndlithe reatha agus/nó chun cosaint a dhéanamh faoi dhlí fostaíochta agus/nó faoi chás dlí. Féach **Aguisín 1: School Record Retention.**

i) Ar fáil má iarrtar iad

Tá sé de cheart ag daoine a s(h)onraí pearsanta a lorg, chomh maith le heolas ar cé lena roinntear na sonraí agus an chúis leis an gcoinneáil.

3. SCÓIP

Baineann an polasaí seo le gach ball foirne, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus le héinne eile a roinneann sonraí (daltaí réamhchláraithe agus a dtuismitheoirí/gcaomhnóirí agus iarrthóirí ar phoist scoile san áireamh) sa mhéad is a bhaineann ábhar an pholasaí leo. Coinneofar na sonraí a roinntear linn go daingean, ionas go mbeidh cosaint á déanamh ar shonraí faoi iontaoibh de réir na ndlithe cuí. Leagann an polasaí seo amach conas a dhéanfar sonraí pearsanta agus sonraí pearsanta íogaireach a chosaint sa scoil.

Sainmhíniú ar Théarmaí Chosaint Sonraí
Chun tuiscint fhoriomlán a fháil ar fhreagrachtaí scoile, seo a leanas cuid téarmaí gur chóir do bhaill foirne a thuiscint:

Sonraí Pearsanta: ciallaíonn seo aon eolas a bhaineann le duine gur féidir a aithint a thagann i seilbh ag an Rialaitheoir Sonraí (Bord Bainistíochta)

Rialaitheoir Sonraí: Sin Bord Bainistíochta na scoile

Ábhar Sonraí: an té lena mbaineann na sonraí pearsanta

Próiseáil Sonraí – ag déanamh oibríochtaí leis an eolas, mar shampla:

- Fáil, taifead nó coinneáil eolais
- Bailiú, eagrú, stóráil, athrú nó leasú sonraí
- Aisghabháil, dul i gcomhairle i dtaobh nó úsáid sonraí
- Roinnt sonraí trí scaipeadh nó á chur ar fáil
- Cur le chéile, cur bac ar, scriosadh nó glanadh sonraí

Riarthóir Sonraí - an té a dhéanann próiseáil ar shonraí thar cheann an rialaitheora, nach **fostaí leis an rialaitheoir atá ann**, mar chuid den fhostaíocht, mar shampla, fostaí le heagraíocht a fhostaítear chun obair a dhéanamh. Leagann dlíthe um Chosaint Sonraí freagrachtaí ar a leithéid maidir le próiseáil sonraí. Riarthóirí a n-úsáidtear ag Gaelscoil Átha Í ná Sales Pulse agus Collsoft

Baineann **Sonraí Pearsanta Íogaireacha** le sonraí a bhaineann le

- Cine nó le heitneach
- Tuairimí polaitiúla, creidimh nó fealsúnacha
- Sláinte coirp nó meabharshláinte
- Claonadh gnéis
- Sonraí géiniteach
- Ciontaithe nó líomhaintí coiriúla
- Ballraíocht de cheardchumann

Sárú ar shonraí – sárú ar chosaint a ghineann scrios timpisteach nó d'aon ghnó, athrú, cailliúint, nochtadh mídhleathach nó fáil ar shonraí gan chead. Ciallaíonn sé seo cailliúint nó scaoileadh, is cuma cá háit nó conas a tharlaíonn sé.

4. RÉASÚNAÍOCHT

Chomh maith le freagrachtaí dleathacha de réir dlithe oideachais, tá freagracht dhleathach ar an scoil de reir Dlíthe um Chosaint Sonraí 1988 – 2018 agus GDPR.

Míníonn an polasaí seo na cineálacha sonraí a bhailítear, cén chúis a bhaineann leis an mbailiú, fad stórála agus cén lena roinntear an t-eolas. Aithníomid agus glacaimid lenár bhfreagrachtaí go han-dáiríre agus is mian linn cleachtais a chur i bhfeidhm chun sonraí pearsanta a chosaint. Aithnímid chomh maith an tábhacht a bhaineann le taifid chruinne a choinneáil agus a stóráil go daingean. Tugann na cleachtais seo deis don Phríomhoide agus don Bhord Bainistíochta cinnidh maidir le rith éifeachtach na scoile. Tá láimhseáil éifeachtach sonraí riachtanach chun cur le leanúnachas agus comhsheasmhacht i gcás athrú foirne na scoile nó an Bhoird Bainistíochta.

Freagrachtaí dlí eile
Tógann cur i bhfeidhm an pholasaí seo freagrachtaí dlí eile san áireamh. Tá dlúthbhaint ag cuid de na freagrachtaí seo le cosaint sonraí. Mar shampla:

Faoi **Mhír 9(g) den Acht Oideachais 1998**, tá rochtain ag tuismitheoirí, nó ag an dalta féin nuair a shroicheann siad 18 mbliana d'aois, ar shonraí a bhaineann le dul chun cinn an dalta le linn na tréimhse oideachais

Faoi **Mhír 20 den Acht Oideachais (Leas) 2000**, is gá do scoil taifead do gach dalta a choinneáil
sa Chlárleabhar

Faoi **Mhír 20(5) den Acht Oideachais (Leas) 2000**, tá dualgas ar phríomhoide eolas maidir le tinreamh daltaí agus eolas eile a ghabhann le dul chun cinn oideachasúil an dalta a roinnt le príomhoide ar scoil a mbeidh siad ag freastal uirthi. Cuireann Gaelscoil Átha Í cóip de *Phas Oideachais* an dalta, mar a shonraítear ag an NCCA, ar aghaidh chuig príomhoide na meánscoile cláraithe cuí tríd an bpost.

Sa chás go mbíonn tuairisc ullmhaithe ag daoine gairmiúla, lasmuigh d'fhoireann Ghaelscoil Átha Í, mar chuid de chomhaid na ndaltaí, ní chuirfear an t-eolas sin ar aghaidh ach le cead sonrach scríofa ó thuismitheoirí an dalta.

Faoi **Mhír 21 den Acht Oideachais (Leas) 2000**, is gá do scoileanna tinreamh laethúil na ndaltaí uile a thaifead.

Faoi **Mhír 28 den Acht Oideachais (Leas) 2000,** is féidir le scoileanna sonraí pearsanta ar dhaltaí a sholáthar d'fhorais airithe (An Roinn Oideachais agus Scileanna, Tusla, NCSE agus scoileanna eile). Caithfidh an Bord Bainistíochta a chinntiú go bhfuil feidhm ábhartha (stair

oideachais agus forbartha, monatóireacht ar dhul chun chinn, taighde a dhéanamh ar scrúdaithe, rannphairtíocht san oideachas agus éifeacht ghinearálta oideachais ina measc).

Faoi **Mhír 14 den Acht EPSEN 2004**, tá dualgas ar scoileanna eolas a roinnt leis an NCSE (agus fostaithe léi, SENOnna san áireamh) de reir mar a lorgaítear é.

Sonraíonn an **Acht um Shaoráil Fáisneise 2014** go bhfuil cead rochtain ar eolas a choinnítear ag forais phoiblí nach gá gur eolas pearsanta atá ann, maraon le dlíth chosaint sonraí. Cé nach n-áirítear scoileanna faoin Acht seo (seachas scoileanna faoi réir an ETB), is gá taifid a seoladh cheana chuig foras a clúdaítear faoin Acht (Roinn Oideachais agus Scileanna, mar shampla) a scaoileadh má iarrtar ar an bhforas sin don eolas.

Faoi **Mhír 26(4) den Acht Sláinte 1947**, is féidir le scoileanna sonraí pearsanta a roinnt le húdáráis shláinte (ainmneacha agus seoltaí na ndaltaí san áireamh) má chuirtear in iúl go bhfuil na sonraí de dhíth chuig cigireacht sláinte m.sh. scrúdaithe súl

De réir **Acht Children First 2015,** tá dualgas ar dhaoine sainordaithe buairt faoi chaomhnú páistí a chur ar aghaidh chuig Tusla (nó chuig na Gardaí sa chás nach mbíonn Tusla ar fáil).

5. GAOL LE SPIORAD SAINIÚIL NA SCOILE:

Is mian le Gaelscoil Átha Í:

- Go mbainfidh daltaí a n-ardchumais phearsanta amach
- Timpeallacht shlán shábhailte a chur ar fáil chun foghlaim a chothú
- Meas a chothú d'éagsúlacht luachanna, creidimh, traidisiúin, teangacha agus bealaí maireachtála

Is mian linn na cuspóirí sin a bhaint amach agus muid airdeallach ar phríobhaideachas agus ar chearta chosaint sonraí an uile dalta, ball foirne, tuismitheoir/caomhnóir agus siúd uile a dhéanann cumarsaid linn. Cuirfear na cuspóirí seo chun cinn comhthreomhar le cearta an duine faoi dhlíthe um chosaint sonraí.

6. SONRAÍ PEARSANTA

D'fhéadfadh na sonraí seo a leanas a bheith mar chuid de *shonraí pearsanta* a choinnítear ag an scoil:

a) Taifid Foirne:

i. Rannóga thaifid foirne:

Chomh maith le hiar-bhaill foirne agud baill reatha, baineann na taifid seo le hiarrthóirí ar phoist sa scoil, le habhair-oidí agus le hoidí faoi phromhadh.

San aireamh leis na taifid foirne seo, d'fhéadfadh:

- Ainm, seoladh, sonraí teagmhála agus uimhir PPS
- Ainm agus sonraí teagmhala i gcás eigeandála
- Bunchóipeanna d'iarratais agus ceapacháin do phostanna freagrachta
- Taifead ar as láithreachtaí (sos gairme, saoire tuismitheora, srl.)
- Taifead ar obair (cáilíochtaí, ranganna múinte, abhair, srl.)
- Sonraí ar eachtraí/thimpistí ar láthair na scoile nó bainteach leis an mball foirne i mbun oibre don scoil
- Taifid ar thuairiscí déanta ag an scoil (nó ag baill foirne) i leith baill foirne chuig rannóga Stáit nó forais eile faoi Acht *Children First* 2015

ii. *Feidhmeanna:*

Coinnítear taifid foirne chun:

- Bhainistíocht agus riarachán scoile (reatha agus sa todhchaí) a éascú
- Riaracháin a dhéanamh ar íocaíochtaí foirne agus chun teidlíocht (pinsean srl.) airgeadais a riaradh
- Theidlíocht pinsin sa todhchaí a ríomh
- Bainstíocht foirne a laimhseáil
- Taifead a choinneail ar ardú céime (taifid ar iarratais phoist) agus ar athrú dualgais
- Dualgais na scoile mar fhostóir a chomhlíonadh, láthair slán, éifeachtach agus múinteoireachta a sholáthar de réir freagrachtaí ón Acht um Shabhailteacht, Shláinte agus Leas ag Obair, 2005 san áireamh
- Cloígh le riachtanais a leagtar ar scoileanna ag an Roinn Oideachais agus Scileanna, ag na Coimisineirí Ioncaim, NCSE, Tusla, HSE agus aon rannóg stáir nó foras reachtúil eile
- Cloígh le dlíthe ábhartha don scoil.

iii. Suíomh agus cleachtais slándála i nGaelscoil Átha Í:

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.

b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

b) Taifid ar Dhaltaí:

i. Rannóga de thaifid ar dhaltaí:

San áireamh, féadfaidh:

- Eolas a lorgaítear ar chlárúchán na ndaltaí a bhféadfadh a bheith bailithe agus cláraithe le linn na treimhe scolaíochta linn. Ina measc siúd ná:
  - ainm, seoladh, sonraí teagmhala, uimhir PPS an dalta
  - dáta agus suíomh breithe
  - ainmneacha agus seoltaí le tuismitheoirí/caomhnóirí agus a sonraí teagmhála (socruithe ábhartha i leith caomhnóireacht, cúram nó rochtain)
  - creideamh
  - cine nó cúlra eithneach
  - ballraíocht den Lucht Siúil, más cuí
  - má tá Cárta Leighis acu (nó ag tuismitheoirí)
  - más Béarla máthairtheanga an dalta nó má tá tacaíocht shonrach sa Bhéarla de dhíth
  - aon eolas ábhartha eile (riachtanais speisialta oideachais, cúrsaí sláinte, etc.) a bhaineann leis an dalta
- Eolas ar oideachas réamh-chlárúcháin (tuairiscí, litreacha molta, measúnaithe nó taifid ó scoil eile) ó scoileanna/shuímh oideachais ar fhreastail an dalta air
- Measúnaithe siceolaíocha, síciatracha agus/nó slainte
- Taifid ar thinreamh
- Grianghraifeanna nó íomhánna taifeadtha (ag ócáidí scoile nó ag leiriú baint amach)
- Taifid acadúla – ábhair glactha, tionscnaimh ranga, torthaí scrúdaithe mar a shonraítear ar thuairiscí bliantiúla scoile
- Taifead ar bhaint amach
- Teidlíocht ar dhíolúine ón nGaeilge
- Taifid ar eachtraí iompair/iniúchad ar eachtraí agus/nó smachtbhannaí a leagadh ar an dalta
- Taifid eile m.sh. tuairiscí ar thimpistí (Nóta: is cóir don scoil cur in iúl do thuismitheoirí go bhfuil taifead a choinneáil ar a leitheád cáis)
- Taifid ar thuairiscí déanta ag an scoil (nó fostaí na scoile) maidir leis an dalta chuig forais stáit faoi Acht *Children First 2015*

ii. Feidhmeanna:

Coinnítear na taifid seo chun:

- Seans a thabhairt do gach paist barr a c(h)umais a bhaint amach
- Cloígh le freagrachtaí dleathacha agus riaracháin
- Cinntiú gur féidir le daltaí ábhartha leas a bhaint as tacaíocht oideachais agus airgeadais cuí
- Tacú le soláthar theagasc Críostaí
- Ligint don scoil teagmháil a dhéanamh le tuismitheoirí/caomhnóirí i gcásanna eigeandála nó dúnadh scoile, nó chun tuismitheoirí/caomhnóirí a chur ar an eolas maidir le dul chun cinn na ndaltaí, nó chun eolas a scaipeadh maidir le hócáidí scoile, srl.
- Freastal ar riachtanais oideachais, sóisialta, fisiciúla agus mothalacha na ndaltaí

- Ceiliúradh a dhéanamh ar shaothair. Glactar grianghraifeanna chun bliainiris a chur le chéile, chun cur le suíomh idirlín na scoile, chun taifid a choinneail ar ócáidí scoile, agus chun stair na scoile a thaifead.
- Cinntiú go gcomhlíonann an dalta coinníollacha iontrála na scoile
- Cinntiú go gcomhlíonann daltaí íos-aois freastail do bhunscoileanna
- Cinntiú go gcomhlíonanna daltaí a chuireann isteach ar dhíolúine ón nGaeilge na coinníollacha cuí
- Sonraí a sholáthar don Roinn Oideachais agus Scileanna, son NCSE, do Thusla, agus do scoileanna eile de réir treoir na rannóga Stáit cuí
- Sonraí a chur ar fáil ar iarraidh ón dalta (nó ó thuismitheoirí/chaomhnóirí muna bhfuil aois 18 mbliana sroichte ag an dalta) nó do scoileanna iar-bhunleibhéil.

iii. Suíomh agus cleachtais slándála i nGaelscoil Átha Í:

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.
b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

c) Taifid an Bhoird Bainistíochta:

i. Rannóga shonraí an Bhoird Bainistíochta:

- Ainm, seoladh agus sonraí teagmhála bhaill an Bhoird (iar-bhaill san áireamh)
- Taifid maidir le ceapacháin don Bhord Bainistíochta
- Miontuairiscí chruinnithe an Bhoird agus comhfhreagras an Bhoird (litreacha molta san áireamh)

ii. Feidhmeanna:

Chun ligint don Bhord Bainistíocht feidhmniú de réir an Acht Oideachais 1998 agus dlíthe cuí eile agus chun taifead a choinneáil ar cheapacháin Bhoird agus cinnidh a thógtar.

iii. Suíomh agus cleachtais slándála i nGaelscoil Átha Í:

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.
b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

d) Taifid Eile: Creidiúnaithe

i. Rannóga shonraí coinnithe ag an mBord Bainistíochta:

Féadfaidh an scoil cuid nó an uile eolais seo a leanas a choinneáil maidir le credidiúnaithe:

- ainm
- seoladh
- sonraí teagmhála
- uimhir PPS
- sonraí cánacha
- sonraí bainc
- méid íoctha

ii. Feidhmeanna:

Coinnítear sonraí creidiúnaithe ar na cúiseanna seo a leanas:

Bíonn an t-eolas seo de dhíth chun bainistíocht agus riarachán a dhéanamh ar chúrsaí airgid na scoile, íoc sonraisc, cur le chéile cuntais bhliantiúla agus iniúchadh na gComisinéirí Ioncaim san áireamh.

iii. Suíomh agus cleachtais slándála i nGaelscoil Átha Í

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.

b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

e) Taifid Eile: Foirmeacha aisíochta cánach do charthanacht

i. Rannóga shonraí coinnithe ag an mBord Bainistíochta:

Féadfaidh an scoil na sonraí seo a leanas a choinneáil maidir le síntiúis charthanacht don scoil:

- ainm
- seoladh
- sonraí teagmhala
- uimhir PPS
- ráta cánach
- síniú
- méid iomlan an síntiúis.

ii. Feidhmeanna:

Is féidir le scoileanna scéim aisíocaíochta cánach a úsáid maidir le síntiúis a thugtar dóibh. Chun an aisíoc a fháil, is gá don síntiúsóir teastas CHY2 a chur ar aghaidh chuig an scoil. Coinnítear an t-eolas seo sa scoil do chás iniúchadh ag na Coimisinéirí Ioncaim.

iii. Suíomh agus cleachtais slándála i nGaelscoil Átha Í:

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.

b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

f) *Taifid Eile: Torthaí Scrúdaithe*

i. *Rannóga shonraí coinnithe ag an mBord Bainistíochta:*

Coinníonn an scoil eolas maidir le torthaí scrúdaithe na ndaltaí. San aireamh anseo ná scrúdaithe ranga, téarma, bliantiúla, measúnú leanúnacha agus scrúdaithe caighdeánaithe.

ii. *Feidhmeanna:*

An phríomhfheidhm a bhaineann le coinneáil na dtorthaí scrúdaithe ná chun dul chun cinn an dalta a mheas agus chun bunús cinnte a chruthú chun comhairle a chur ar thuismitheoirí/chaomhnóirí nó ar an dalta féin i leith an dul chun cinn sin. Is feidir an t-eolas seo a rangú nó a thuairsciú chun nósanna scoile a aithint. Feadfaidh an t-eolas seo a roinnt leis an Roinn Oideachais agus Scileanna, NCCA agus scoileanna eile chuig a mbogann na daltaí.

iii. *Suíomh agus cleachtais slándála i nGaelscoil Átha Í*

a. Coinnítear cóipeanna crua faoi ghlas i dtaisceadán daingean in oifig riaracháin a bhíonn faoi ghlas. Bíonn rochtain ag pearsanra ainmnithe ceadaithe ar na sonraí seo. Is gá d'fhostaithe na scoile rúndacht na sonraí a choinneáil.
b. Coinnítear sonraí digiteacha ar ríomhaire le pasfhocal agus bogearraí slándála air san oifig riaracháin a bhíonn faoi ghlas. Cuirtear alaram gadaíochta ar siúl lasmuigh d'amanna scoile.

7. NAISC LE POLASAITHE SCOILE EILE

Is gá go mbeidh ár bpolasaithe scoile ag tacú lena chéil, laistigh den Phlean Scoile. Deanfar athbhreithniú ar pholasaithe scoile ábhartha i gcomhar leis an bPolasaí um Chosaint Sonraí agus déanfar deileáil le haon impleachtaí a n-eascraíonn dá réir.

Féadfadh tionchar a bheith ag an bPolasaí um Chosaint Sonraí ar na polasaithe seo a leanas:

- Pupil Online Database (POD): Bailiú sonraí do bhunachar na Roinne Oideachais agus Scileanna
- Caomhnú Páistí
- Beartas Frith-bhulaíochta
- Cód Iompair na Scoile
- Polasaí Iontrála agus Rannpháirtíochta
- Úsáid Inghlactha TFC
- Polasaí Measúnaithe
- Polasaí do Riachtanais Oideachais Speisialta
- Polasaí Leabharlainne
- Scéim scoile do Leabhair Chíosa
- Polasaí do Theagmhais Chriticiúil
- Straitéis um Fhreastal Scoile

8. PRÓISEÁIL SONRAÍ DE RÉIR CEARTA AN DUINE ÁBHARTHA SONRAÍ

Déanfar deileáil le sonraí sa scoil seo ag tabhairt san áireamh cearta an duine ábhartha. Bíonn na cearta seo a leanas an an duine ábhartha:

- Fios a bheith acu cén sonraí pearsanta a ghabhann leo a choinnítear sa scoil Request access to *any data* held about them by a data controller
- Bac a chur ar úsáid a sonraí pearsanta don díolachán díreach
- Iarratas a dhéanamh chun eolas míchruinn a leasú
- Iarratas a dhéanamh sonraí nach bhfuil ábharthach a scriosadh

Riarthóirí Sonraí

Nuair a chuireann scoil sonraí amach chuig riarthóirí seachtracha, tá dualgais dleathach ar an scoil conradh scríbhinn a bheith ann. Féach **Aguisín 2: Written Third Party Service Agreement**. Sonraíonn an comhaontú seo na coinníollacha gur féidir na sonraí a phrósieáil, coinníollach slándála a ghabhann leis agus gur ghá na sonraí a scriosadh nó a ais-sheoladh ar fhoirceannadh an chonartha.

Sárú ar Shonraí Pearsanta

Is gá aon eachtra a bhaineann le sárú shonraí pearsanta a chur in iúl d'Oifig an Chomisinéara Chosaint Sonraí laistigh de 72 uair.

Sa chás go mbíonn baol ann do chearta nó do shaoirse daoine, is gá don Bhord Bainistíochta an sárú a chur in iúl don té sin gan mhoill.

Má fhaigeann riarthóir sonraí eolas faoi shárú shonraí pearsanta, is gá an t-eolas seo a roinnt leis an mBord Bainistíochta (rialaitheoir sonraí) gan mhoill.

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.

Ag deileáil le hiarratas ar shonraí

Tá cead sonraí pearsanta a lorg ach iarratas scríofa a chur isteach.

Féach **Aguisín 3: Data Access Request Form.**

Is gá freagra a thabhairt ar an iarratas laistigh de mhí. Uaireanta, beidh síneadh ama de dhíth m.sh. i rith laethanta saoire nó eile.

Ní feidir táille a ghearradh ar an iarratas seo ach amhain sa chás go mbíonn iarratais leanúnacha ann nó go mbíonn na hiarratais gan chúis nó iomarcach.

Ní chuirtear aon eolas pearsanta a bhaineann le daoine eile seachas an duine ábhartha ar fáil.

Ag roinnt eolais ar an ngUthán

Ba chóir d'fhostaithe a bheith airdeallach faoi shonraí a scaoiltear ar an nguthán.

Go háirithe, ba chóir don fhostaí:

- Iarraidh ar an té iarratas scríofa a chur isteach
- Comhairle an Phríomhoide a lorg i gcásanna deacra/achrannacha
- Gan brú a bheith orthu eolas a scaoileadh.

9. RÓIL AGUS FREAGRACHTAÍ

Is e an Bord Bainistíonchta and Rialaitheoir Sonraí sa scoil agus cuireann an Príomhoide an polasaí i bhfeidhm sa scoil, ag cinntiú go bhfuil freagrachtaí i leith chosaint sonraí ar eolas acu siúd a ndéanann deileáil le sonraí pearsanta sa scoil.

Seo a leanas iad siúd le freagrachtaí sonracha i leith chosaint sonraí

Ainm	**Freagracht**
Bord Bainistíochta:	Rialaitheoir Sonraí
Príomhoide:	Cur i bhfeidhm an pholasaí

10. CUR I BHFEIDHM AN PHOLASAÍ

Déanfar monatóireacht ar chur i bhfeidhm an pholasaí ag an bPríomhoide, baill foirne agus an Bord Bainistíochta.

11. FAOMHADH AGUS CUMARSÁID

Rinneadh faomhadh ar an bpolasí seo don chéad uair ag cruinniú den Bhord Bainistíochta ar 26ú Samhain 2018. Cuireadh taifeadh den fhaomhadh seo sna miontuairiscí.

12. ATHBHREITHNIÚ AGUS RÁTHÚLACHT

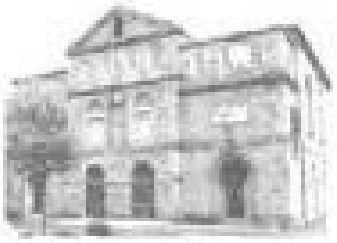
Déanfar athbhreithniú ar an bpolasaí seo de réir an plean forbartha scoile.
Déanfar athbhreithniú agus ráthúlacht an pholasaí a mheas de reir treoirlínte nó malairt eolais a thagann chun cinn (ón ROS, Tusla, ón gCoimisinéir um Chosaint Sonraí nó eile), aischothú ó thuismitheoirí, ó bhaill foirne nó eile.

Cuireadh an polasaí seo faoi bhráid an Bhoird Bainistíochta ar
agus rinneadh faomhadh air.

SÍNITHE

_____	_____
Treasa Uí Néill,	Eoin ó Pluincéid
Cathaoirleach.	*Príomhoide.*
Dáta:	

Gaelscoil



Átha Í

Data Protection Policy

DATA PROTECTION POLICY

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DATA PROTECTION POLICY

1. 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

Gaelscoil Átha Í operates a "***Privacy by Design***" method in relation to Data Protection. This means we plan carefully when gathering personal data so that we build in the ***data protection principles*** as integral elements of all data operations in advance. We audit the personal data we hold in order to

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

2. 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:

a) ***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.

b) ***Consent***

Where consent is the basis for provision of personal data, (e.g. data required to join sports team/ after-school activity or any other optional school activity) the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes. Gaelscoil Átha Í 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.

c) Keep it only for one or more specified and explicit lawful purposes

The BoM will inform individuals of the reasons they collect their data and the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.

d) 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.

e) Keep Personal Data safe and secure

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

f) Keep Personal Data accurate, complete and up-to-date

Students, parents/guardians, and/or staff should inform the school of any change which the school should make to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records. Records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation should be dated and signed by the person making that change

g) 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.

h) Retain it no longer than is necessary for the specified purpose or purposes for which it was given

As a general rule, the information will be kept for the duration of the individual's time in the school. Thereafter, the school will comply with DES guidelines on the storage of Personal Data relating to a student. In the case of members of staff, the school will comply with both DES guidelines and the requirements of the Revenue Commissioners with regard to the retention of records relating to employees. The school may also retain the data relating to

an individual for a longer length of time for the purposes of complying with relevant provisions of law and

or/defending a claim under employment legislation and/or contract and/or civil law. See **Appendix 1: School Record Retention** table

i) Provide a copy of their personal data to any individual on request

Individuals have a right to know and have access to a copy of personal data held about them, by whom, and the purpose for which it is held.

3. 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. Data Processors used by us in

Gaelscoil Átha Í include Sales Pulse data management system, Collsoft school accounting and wages processor, POD online schools data management programme and OLCS returns to the Department of Educaiton and Skills.

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

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

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

4. Rationale

In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the Data Protection Acts 1988 to 2018 and the GDPR.

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared. The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the Principal and Board of Management to make decisions in respect of the efficient running of the School. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and Board of Management

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

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

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

Under S***ection 20(5) of the Education (Welfare) Act, 2000***, a Principal is obliged to notify certain information relating to the child's attendance in school and other matters relating to the child's educational progress to the Principal of another school to which a student is transferring. Gaelscoil Átha Í sends, by post, a copy of a child's *Passport,* as provided by the National Council for Curriculum and Assessment, to the Principal of the Post-Primary School in which the pupil has been enrolled.

Where reports on pupils which have been completed by professionals, apart from Gaelscoil Átha Í 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 2014*** 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)

5. Relationship to characteristic spirit of the School:

Gaelscoil Átha Í seeks to:

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

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

6. 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.
- 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

ii. *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.

iii. Location and Security procedures of Gaelscoil Átha Í:

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

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

- o whether they (or their parents) are medical card holders
- o whether English is the student's first language and/or whether the student requires English language support
- o any relevant special conditions (e.g. special educational needs, health issues, etc.) which may apply

- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements) are managed in line with the accompanying policy on school photography.
- Academic record – subjects studied, class assignments, examination results as recorded on official School reports
- Records of significant achievements
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Other records e.g. records of any serious injuries/accidents, etc. (Note: it is advisable to inform parents that a particular incident is being recorded).
- Records of any reports the school (or its employees) have made in respect of the student to State Departments and/or other agencies under Children First Act 2015.

ii. 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 Photography Policy'* and '*School Website Privacy Statement'*.
- 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 ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- to furnish documentation/information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and

other schools, etc. in compliance with law and directions issued by government departments

- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/references to second-level educational institutions.

iii. Location and Security procedures of Gaelscoil Átha Í:

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

c) Board of Management records:

i. 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.

ii. 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.

iii. Location and Security procedures of Gaelscoil Átha Í:

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

d) Other Records: Creditors

i. 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

ii. 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.

iii. Location and Security procedures of Gaelscoil Átha Í

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

e) Other Records: Charity Tax-back Forms

i. 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.

ii. 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 event of an audit by the Revenue Commissioners.

iii. Location and Security procedures of Gaelscoil Átha Í:

a. Manual records are kept in a secure, locked filing cabinet in a locked administration office only accessible to personnel who are authorised to use

the data. Employees are required to maintain the confidentiality of any data to which they have access.

b. Digital records are stored on password-protected computers with adequate encryption and firewall software in a locked office. The school has the burglar alarm activated during out-of-school hours.

f) *Other records: Examination results*

i. *Categories of Board of Management data:*

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

ii. *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.

iii. *Location and Security procedures of Gaelscoil Átha Í*

a. Manual records are kept in a secure, locked filing cabinet in a locked administration office only accessible to personnel who are authorised to use the data. Employees are required to maintain the confidentiality of any data to which they have access.

b. Digital records are stored on password-protected computer with adequate encryption and firewall software in a locked office. The school has the burglar alarm activated during out-of-school hours.

7. Links to other policies and to curriculum delivery

Our school policies need to be consistent with one another, within the framework of the overall School Plan. Relevant school policies already in place or being developed or reviewed, shall be examined with reference to the *Data Protection Policy* and any implications which it has for them shall be addressed.

The following policies may be among those considered:

- Pupil Online Database (POD): Collection of the data for the purposes of complying with the Department of Education and Skills' pupil online database.
- Child Protection Procedures
- Anti-Bullying Procedures
- Code of Behaviour
- Enrolment Policy
- ICT Acceptable Usage Policy
- Assessment Policy
- Special Educational Needs Policy
- Library Policy
- Book-Rental Policy
- Critical Incident Policy
- Attendance Policy

8. 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. See **Appendix 2: Written Third Party Service Agreement.** Gaelscoil Átha Í'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 Commissioner within 72 hours.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the BoM must communicate the personal data breach to the data subject without undue delay.
If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (BoM) without undue delay.

Dealing with a data access request
Individuals are entitled to a copy of their personal data on written request.
See **Appendix 3: Data Access Request Form**
This request must be responded to within one month. An extension may be required e.g. over holiday periods.
No fee may be charged except in exceptional circumstances where the requests are repetitive or manifestly unfounded or excessive.
No personal data can be supplied relating to another individual apart from the data subject.

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

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

9. ROLES AND RESPONSIBILITIES

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

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

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

10. IMPLEMENTATION OF THE POLICY

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

11. RATIFICATION & COMMUNICATION

This policy was ratified for the first time at the Board of Management meeting on 26th November 2018 and signed by the Chairperson. The ratification is recorded in the minutes of the meeting.

12. REVIEWING AND EVALUATING THE POLICY

The policy will be reviewed and evaluated in accordance with the school's development plan. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or TUSLA), legislation and feedback from parents/guardians, students, school staff and others. The policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

This policy was re-ratified by the Board of Management on:

SÍNITHE

_____	_____
Treasa Uí Néill,	Eoin ó Pluincéid
Cathaoirleach.	*Príomhoide.*
Dáta:	