

Our Lady of Fatima



Data Protection Policy

Introduction:

This policy has been put in place to ensure that proper procedures are in place in relation to how personal data on staff, students and other individuals are kept and processed both in manual form and on computer and how the data concerned is protected.

Rationale:

- A policy on data protection and record keeping is necessary to ensure that the school has proper procedures in place in relation to accountability and transparency
- It is good practice to record pupil progress so as to identify learning needs
- A policy must be put in place to ensure a school complies with legislation such as:
 - Education Act 1998
 - Education Welfare Act 2000
 - Data Protection Act 2003
 - Freedom of Information Act 1997
 - The National Strategy to improve Literacy and Numeracy among Children and Young People 2011 - 2020

Objectives:

1. To ensure that the school complies with the Data Protection Acts.
2. To ensure compliance by the school with the eight rules of data protection as set down by the Data Protection Commissioner based on the Act.
3. Obtain and process information fairly.
4. Keep it only for one or more specified, explicit and lawful purposes.
5. Use and disclose it only in ways compatible with these purposes.
6. Keep it safe and secure.
7. Keep it accurate, complete and up-to-date.
8. Ensure that it is adequate, relevant and not excessive.
9. Retain it for no longer than is necessary for the purpose or purposes.

10. Give a copy of his/her personal data to that individual on request.
11. To ensure that the data protection rights of students, staff and other members of the school community are safeguarded.

Guidelines:

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The Principal assumes the function of data controller and supervises the application of the Data Protection Act within the school. The data under the control of the Principal comes under the following headings.

A. Personal Data:

This data relates to personal details of the students such as name, address, date of birth, gender, family status, parents' place of employment, ethnic origin, nationality, religious belief, medical details, dietary information, PPSN, home telephone and mobile contact details. It also includes the names of students' parents/guardians. This information is included in the School Enrolment Form. These forms are kept in the Principal's Office. Information such as name, address, contact numbers etc. on pupils are stored in both hard and soft copy format.

Student Records:

Student records outlined below are held by each class teacher and also in the Principal's Office.

Such student records contain:-

- Personal details of the student
- School report cards
- Attendance Records
- Psychological Report and other reports such as Speech & Language and Occupational Therapy.
- Teacher-designed tests. Each class teacher designs his/her own test template
- Individual Education Plans, Individual Pupil Learning Plans and records of meetings with the stakeholders regarding these plans
- Portfolios of student work e.g. Projects/Art and achievements on tests.

The following records are stored securely in the Principal's Office

- Psychological Assessments
- Assessment results carried out by professionals to assist teaching and learning (e.g. results of psychiatric reports; occupational therapy reports; speech and language assessments; etc.).
- Individual Education Plans, Individual Pupil Learning Plans and records of meetings with the stakeholders regarding these plans.
- Child Protection concerns and HSE referrals
- Minutes of HSE Child Protection Conferences.

B. Administrative Data:

- Attendance Reports, Roll Book, Registers; Class files; Pupil Profile files; Enrolment applications; baptismal certificate copy (where applicable)
- Correspondence between parents and teachers.
- Accident Report Book detailing injury and treatment applied
- Incident Book
- Administration of Medicines Indemnity Forms
- Pupil behavior records and Records of allegations/ incidents of bullying and alleged bullying (kept in Principal's Office)
- Records kept in line with Children First Procedures (kept in Secretary's Office)

Board of Management records: These include:

- Name, address and contact details of each member 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.
- Minutes, reports and correspondence relating to the Board of Management are kept in the Principal's office. Child Protection matters reported to the Board will not identify a pupil by name except in exceptional circumstances.

Access to Records:

The following will have access where relevant and appropriate to the data listed above where pupils are identified by name:

- Parents/Guardians
- Past Pupils over 18
- TUSLA
- National Educational Psychological Service
- National Education Welfare Board
- Occupational Therapists or Speech Therapists working with pupils
- Designated School Personnel
- Department of Education and Skills (where necessary)
- First and Second level schools (where relevant)
- Board of Management

With the exception of child protection-related data, data on attendance, parental authorisation must be provided by parents in the event of data being transferred to outside agencies. Outside agencies requesting access to records must do so in writing. Parents/Guardians of current pupils can make such a request in writing. Past pupils and parents of past pupils seeking data must do so in writing.

C. Staff Data

Staff records include name, address, contact details, teacher number, Teaching Council Number, PPSN, qualifications, records of interview contracts, references, curriculum vitae, job applications, attendance records, Teaching Council registration Garda Clearance, Statutory Declaration where necessary, Medical Fitness to Teach. Access is restricted to the Principal and Secretary.

These records are kept in the Principal's office. Attendance details are recorded on the OLCS system, are password protected and are accessed by the Secretary, the Principal, Deputy Principal and the Chairperson of the Board of Management if necessary.

D. Students' Attendance Records:

Pupils' attendance will be recorded and stored on the Aladdin software administration system. This system is password protected and is accessed by the Secretary and the Principal. Teachers can access their own class records in any given year. These class records are password protected.

Storage:

Records are securely stored in the Principal's or Secretaries office. Older records may be stored in the Photocopier room. Records are stored indefinitely.

All completed school Roll Books, Registers and Leabhar Tinrimh are stored in same location together with Accident Report Books and Incident/Bullying Report Books. Access to these stored files is restricted to authorised personnel only. For computerised records, systems are password protected.

Access to Pupil Records:

A parent may apply for access to their records until the child reaches the age of 18 years. A past pupil may apply for access to their own records from the age of 18 years.

A written application will be required, accompanied by a form of (in some cases). Records will be provided within 30 days.

Transfer of Student Records:

All student records are transferred via POD, by Parents/Guardians or by school under Parent instruction.

CCTV data usage:

CCTV cameras are in operation at the following points in the school;

A. **Externally**, cameras are in use at:

1. Main entrance door to school.

Also:

- Cam 1: Front Door facing drive
- Cam 2: Back wall @ Middle 2
- Cam 3: Front @ Senior 3
- Cam 4: Side @ Bins
- Cam 5: Side @ Art room
- Cam 6: Front @ Basketball Court
- Cam 7: Side Door - Caretaker
- Cam 8: Garage facing front
- Cam 9: Back @ Playground
- Cam 10: Internal Garden facing staffroom
- Cam 11: Internal Garden facing Greenhouse

Use of CCTV images;

The use of this CCTV system is intended primarily to ensure the security of the school premises and its contents. The CCTV system may be used to capture images of intruders or of individuals damaging property or removing goods without authorisation.

A sign informing data subjects that the CCTV system is in operation and the contact details of the monitoring security company will be displayed at the entrance to the school.

Images captured by the CCTV system will be retained on the monitor for a month. In exceptional circumstances images may be retained where an investigation by An Garda Síochána is ongoing or where such images are the subject of court proceedings.

If the Gardaí want CCTV images for a specific investigation, the data controller will satisfy themselves that there is a genuine investigation underway. A phone call to the requesting Garda's station will be sufficient in confirming that an investigation is authorised.

Any person whose image has been recorded has a right to be given a copy of the information recorded. To exercise that right, a person must make an application in writing. A data controller will charge up to €6.35 for responding to such a request and will respond within 40 days.

Practically, a person must provide necessary information to the data controller, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data.

In giving a person a copy of his/her data, the data controller may provide a still/series of still pictures, a tape or a disk with relevant images. However, other people's images will be obscured before the data are released.

Ratified by the Board of Management on _____ **31st January, 2019** _____.

Signed: _____
Chairperson, B.O.M.