

Gaelscoil Na Lochanna



Polasaí um Chosaint Sonraí & Coimeád Taifid *Data Protection and Record Retention Policy*

Réamhráiteas agus Réasúnaíocht

Is iad foireann Gaelscoil na Lochanna maraon leis an mBord Bainistíochta a chuir an polasaí seo - Polasaí um Chosaint Sonraí agus Coimeád Taifid- le chéile. Cuireadh an Polasaí seo le chéile i Mí Aibreáin 2016. Baineann an polasaí seo le conas mar a dhéantar sonraí pearsanta do dhaltáí, do bhaill fóirne agus d'éinne eile lena ndéanann an scoil gnó (m.sh. tuismitheoirí, baill ón mBord Bainistíochta srl.) a choimeád agus conas mar a dhéantar na sonraí seo a chosaint.

Déanann an Polasaí seo plé ar choimeád agus ar chosaint sonraí atá cláraithe ar pháipéar agus atá cláraithe ar an ríomhaire.

Scóip Sonraí: Ciallaíonn sin faisnéis i bhfoirm inar féidir í a phróiseáil. Áirítear ann sonraí uathoibríthe (faisnéis ar ríomhaire nó faisnéis a taifeadadh chun í a chur ar ríomhaire ar ball) agus lámhshonraí (faisnéis a choimeádtar mar chuid de chorás comhaid ábhartha nó le hintinn a bheith ina chuid de chóras comhaid ábhartha).

Córas Comhaid Ábhartha: Ciallaíonn sé seo aon tacar d'fhaisnéis, bíodh is nach bhfuil sé ríomhairithe, atá struchtúrtha trí thagairt do dhaoine aonair, nó trí thagairt do chritéir i dtaobh daoine aonair, i dtreo is gur furasta rochtain ar fhaisnéis shonrach i dtaobh daoine aonair ar leith.

Sonraí Pearsanta: Ciallaíonn sé seo sonraí a bhaineann le duine aonair gur féidir é/í a aithint ó na sonraí nó ó na sonraí i dteannta faisnéise eile atá i seilbh an rialaitheora sonraí.

Rialaitheoir Sonraí: Ciallaíonn sé seo duine aonair nó aonán dlí a rialaíonn ineachair agus úsáid sonraí pearsanta. Is féidir an scoil a mheas ina rialaitheoir sonraí, an príomhoide ag feidhmiú ar son an Bhoird Bhainistíochta chun na feidhmeanna i gceist a chomhlíonadh.

Aithníonn agus glacann an scoil lena cuid freagrachtaí maidir leis na nithe seo a leanas:

- An tAcht um Chosaint Sonraí 1998 agus An tAcht um Chosaint Sonraí (Leasú) 2003.
- An tAcht Oideachais 1998, alt 9 (g) a chuireann scoil faoi dhualgas taifead a chur ar fáil do thuismitheoirí agus d'iardhaltaí os cionn ocht mbliana déag d'aois.
- An tAcht Oideachais 1988, alt 22.2 (b), a chuireann dualgas ar scoil measúnú rialta a dhéanamh ar dhaltáí agus na torthaí sin a chur ar fáil do dhaltáí agus dá dtuismitheoirí go tréimsiúil.
- An tAcht Oideachais (Leas) 2000, a chuireann dualgas ar scoileanna tinreamh scoile agus aistriú dhaltáí a thuairisciú.

Déanfaidh Gaelscoil Na Lochanna (an scoil) mar Rialaitheoirí Sonraí, gach iarracht réasúnach a freagrachtaí a chomhlíonadh agus deachleachtas i láimhseáil agus úsáid eolais pearsanta a chur chun cinn. Cloifidh an scoil, go háirithe, leis na prionsabail Cosaint Sonraí mar atá leagtha síos sna hAchtanna Cosaint Sonraí.

Sonraíonn na prionsabail seo go mbeidh sonraí:

- Próisithe go cothrom agus go dleathach.
- Próisithe d'fheidhmeanna teoranta.
- Úsáidte agus nochtaithe i mbealaigh atá comhoiriúnach leis na feidhmeanna seo.
- Leormhaith, ábhartha, gan a bheith Iomarcach.
- Beacht agus suas chun dáta nuair is gá.

- Gan a bheith coinnithe níos faide ná mar is gá.
- Próisithe de réir chearta an ábhair sonraí.
- Coinnithe go daingean agus faoi ghlas.
- Caithfidh an Rialaitheoir Sonraí cóip de shonraí pearsanta dhuine a thabhairt dó/di má lorgaíonn sé/sí é.

Gaol le Spiorad saineúil na scoile

Aithníonn Gaelscoil Na Lochanna cearta chun príobháideachta phobail na scoile ar fad.

Aidhmeanna an Pholasáí

- Cinntiú go bhfuil an scoil ag cloí lena dualgaisí dleathacha.
- Cearta agus príobháideacht daoine atá mar ábhair sonraithe a thagann isteach sa scoil a chosaint. (Baill fóirne, Daltaí, Riaracháin, Bord Bainistíochta)
- Saghasanna tuairiscí a choimeádtar agus na modhanna a bhaineann len iad a chur ar fáil do ghrúpaí ábhartha-tuismitheoirí agus iar-dhaltaí os cionn ocht mbliana déag d’aois san áireamh - a shoiléiriú.

Inneachar an Pholasáí

Roinntear an Polasáí seo i ndá chuid mar a leanas:

- A. Eolas ar na sonraí pearsanta ar fad atá á choimeád.
- B. Liosta de na hocht rialacha cosanta sonraí.

A. Eolas ar na sonraí pearsanta ar fad atá á choimeád.

Sonraí faoi na teidil seo a leanas:

1. Sonraí Pearsanta Íogaireach

- Creideamh
- Teastaisí leighis foirne agus comhfhreagras ó ghrúpa Medmark
- Teastas leighis dhalta
- Sonraí a bhaineann le Cosaint leanaí

2. Sonraí Pearsanta

- **Sonraí Rollacháin** Baineann na sonraí seo le sonraí pearsanta na ndaltaí ar nós ainm, seoladh, dáta breithe, inscne, eolas cothaithe, PPSN.
- Sonraí Foirne

Sonraí ar nós ainmneacha, seolta, sonraí teagmhála, uimhir párolla, CV, tuairiscí tinrimh agus cóipeanna de chonraí oibre.

- Sonraí Thuismitheora/Chaomhnóra

Sonraí ar nós eolas ar fhoirm clárúcháin dhalta agus íocaíochta déanta leis an scoil.

- Eile
CV seolta ag daoine ag lorg taithí oibre/ionadaíocht srl. coinnithe sa chód.

3. Taifead na nDaltaí

- Torthaí scrúdaithe deartha ag múinteoirí
- Torthaí scrúdaithe caighdeánacha
- Cóip de POA (Plean Oideachais Aonair do dhaltaí le riachtanais speisialta oideachais)
- Plean Iompair agus Pleananna tacaíochta ranga (nuair is gá)
- Tuairiscí rúnda

- Comhfhreagras ó thuismitheoirí
- Cóipeanna de hOrdú Cúirte maidir le rochtain
- Tuairisc dheireadh na bliana
- Faomhadh acmhainní ón NCSE
- Taifead de mhí-iompar tútach uafásach
- Taifead de chruinnithe idir thuismitheoirí agus an Príomhoide
- Foirmeacha indeimnithe leighis
- Litreacha aistriúcháin
- Cóipeanna de chomhfhreagras a seoladh ag gníomhaireachtaí seachtracha

4. Sonraí Riaracháin

- Leabhar tuairisc eachtraí
- Dialainn tuairisc clóis (taifead d'eachtraí sa chlós)
- Leabhair rollaí, tinrimh agus clárleabhair

5. An Bord Bainistíochta

Cláraíonn fillteán miontuairiscí cruinnithe Boird cinntí an Bhoird agus é i mbun a dhualgas reachtúil.

I measc páipéarachas san fhilteán tá:

- comhfhreagras neamhrialta faighte agus pléite ag an mBord
- cóipeanna de thuairiscí airgeadais curtha os comhair an Bhoird
- cóipeanna de thuairiscí an Phríomhoide curtha faoi bhráid an Bhoird
- aon cháipéisí eile a mhothaíonn an Bord atá oiriúnach le bheith curtha san fhilteán.
- Gearáin curtha faoi bhráid an Bhoird agus aon comhfhreagras a bhaineann leis
- Sonraí Párolla
- Sonraí Airgeadais

Nochtadh taifid

Is féidir gnéithe de na sonraí thuas a nochtadh do na daoine a leanas, nuair a bhíonn sé ábhartha agus oiriúnach, le cead an Rialathóra Sonraí:

- Tuismitheoirí/Caomhnóirí, iardhaltaí os cionn ocht mbliana déag d'aois
- Foireann na scoile
- Gníomhaireachtaí seachtracha ar nós an ROE, HSE, (NCSE srl san áireamh)
- Scoileanna eile ag a bhfuil páistí ag aistriú chucu

Lorgófar cead ó thuistí sula scaoiltear aon eolas le gníomhaireachtaí seachtracha.

Caithfidh gníomhaireachtaí seachtracha nochtadh sonraí a lorg i scríbhinn.

Caithfidh thuismitheoirí/caomhnóirí iarratais a dhéanamh chuig an Rialaitheoir sonraí i scríbhinn chomh maith.

Ag freagairt d'Iarratais

Tabharfaidh an Rialaitheoir Sonraí freagra d'iarratais laistigh de 40 lá den iarratas.

B. Liosta de na hocht rialacha cosanta sonraí

1. Bailigh agus próiseáil na sonraí go cóir, cothrom.
2. Ná coimeád na sonraí ach amháin le haghaidh críche sonraithe, sainráite agus dleathaí amháin nó níos mó.
3. Ná húsáid agus ná nocht na sonraí in aon slí a bheidh neamhréir leis na críocha sin.
4. Coinnigh slán sábháilte an t-eolas agus na sonraí.
5. Bíodh na sonraí beacht, comhlán agus suas chun dáta.

6. Déan cinnte de go bhfuil na sonraí leordhóthanach, ábhartha gan a bheith iomarcach.
7. Ná coimeád na sonraí níos faide ná mar is gá.
8. Tabhair cóip de shonraí pearsanta an duine aonair dó/di má iarrann sé/sí sin.

Treoirleánte ar Am coinneála do Shonraí

Coinneofar sonraí fad is atá daltaí ag freastal ar an scoil/ ball foirne fostaithe sa scoil agus ar feadh tréimhse breise idir 1 agus 8 mbliana.

I gcásanna áirithe, d'fhéadfaí roinnt sonraí a choinneáil níos faide ná seo.

Sonraí Pearsanta agus taifead ar dhaltaí

Coinneofar na rudaí a leanas ar feadh ocht mbliana tar éis do pháiste an scoil a fhágáil (go mbíonn an iardhalta 21 bliana d'aois):

- Tuairiscí scoile deireadh na bliana, gach bliain
- Torthaí scrúdaithe caighdeánacha ó gach bliain sa scoil
- Cóipeanna de na tuairiscí proifisiúnta is déanaí ó ghníomhaireachtaí seachtracha
- Cóipeanna de Phleananna Oideachais Aonair
- Tuairiscí coinnithe ag an bPríomhoide maidir le Cosaint Leanaí/ Leas Leanaí a choinneofar ar feadh am éiginte

Am Coinneála do shonraí riaracháin

- Coinneofar na dialainn clóis, leabhar eachtra agus leatháin taifid ar feadh 8 mbliana
- Coinneofar taifead foirne ar feadh 5 bhliana nuair a imíonn siad agus ansin déanfar stialladh orthu
- Coinneofar taifead maidir le leas foirne ar feadh 8 mbliana
- Coinneofar taifead maidir le fostaithe an Bhoird Bainistíochta ar feadh 8 mbliana
- Déanfar stialladh ar iarratais/CV curtha faoi bhráid na scoile ag lorg taithe oibre ag deireadh na bliana atá i gceist
- Coinneofar taifead airgeadais (oifige) ar feadh 8 mbliana
- Caithfear leabhair rollaí a choinneáil go deo

Am Coinneála do shonraí an Bhoird Bainistíochta

Coinneofar fillteán miontuairiscí na gcruinnithe Boird go deo.

Stóráil

Caithfear aon sonraí atá le stóráil ar feadh 8 mbliana a choinneáil i suíomh daingean agus níl ach pearsanra ainmnithe ceadaithe in ann teacht orthu.

Tá pasfhocal agus ball dóiteáin ar ríomhairí chun sonraí stóráilte orthu a chosaint.
Is gá na pasfhocail a athrú go rialta.

Dáta cur i bhfeidhm

Tá an polasaí seo i bhfeidhm ó Bhealtaine 2016 tar éis don Bhord Bainistíochta é a fhaomhadh.

Bogfar aon sonraí atá le bheith stóráilte go fadtréimhseach go suíomh daingean. As sin amach, scríosfar aon sonraí atá stóráilte os cionn 8 mbliana, agus cuirfear aon sonraí ábhartha fadtréimhseacha ón scoil bhliain roimhe sin i stórais.

Polasaí um Chosaint Sonraí agus Coimeád Sonraí

Seo achoimre ar am coinneála na doiciméidí difriúla sa scoil:

Fad is ata páiste ar scoil	Ar feadh bliana	Go dtí go bhfuil páistí 21	Go deo
<i>Torthaí scrúduithe an mhúinteora</i>	<i>Cvs ar thaithí oibre</i>	<i>Tuairiscí scoile deireadh na bliana (gach bliain)</i>	<i>Leabhair Rolla</i>
<i>Torthaí scrúduithe caighdeánaithe</i>		<i>Torthaí scrúduithe caighdeánaithe ó gach bliain</i>	<i>Filleán Boird Bainistíochta</i>
<i>IPLP/IEP (páistí ag fáil tacaíocht</i>		<i>Cóipeanna dena tuairiscí proifisiúnta is déanaí ó ghníomhaireachtaí seachtracha</i>	
<i>Plean iompair agus plean tacaíochta ranga</i>		<i>Cóipeanna de IPLP/IEP</i>	
<i>Tuairiscí Príobháideacha</i>		<i>Tuairiscí maidir le cosaint Leanaí/ Leas Leanaí</i>	
<i>Comhfhreagras ó thuistí</i>		<i>Dialann / Leabhar Eachtra Clóis</i>	
<i>Cóipeanna de hordú cúirte maidir le Rochtain</i>		<i>Taifead ar leas foirne</i>	
<i>Tuairisc Dheireadh na Bliana (gach bliain)</i>	<i>Taifead Foirne- ar feadh 5 bhliana</i>	<i>Tuairiscí Druil tine</i>	
<i>Faomhadh acmhainní NCSE</i>		<i>Taifead maidir le fostaithe an Bhoird Bainistíochta</i>	
<i>Taifead de mhí iompair tútach+uafásach</i>			
<i>Taifead de chruinnithe idir tuistí+PO</i>			
<i>Foirmeacha indeimnithe leighis</i>			

<i>Cóipeanna de chomhfhreagras a seoladh ag gníomhaíochtaí seachtracha</i>			



Polasaí um Chosaint Sonraí & Coimeád Taifid
Data Protection and Record Retention Policy
[leagan Béarla]

Introduction and Rationale

This policy – Data Protection and Record Retention Policy - was formulated by the staff and Board of Management of Gaelscoil na Lochanna in April- May 2016. This policy deals with how personal data of pupils, staff members and other partners with whom the school deals with (for example, parents, members of the Board of Management etc.) is stored and protected. This policy deals with data which is both stored on paper and on computers.

Scope Data: What is meant by data is information in a form that can be processed. For the purposes of this policy, it includes automated data (information on computer or information recorded with the intention of putting it on a computer) and manual data (information that is kept as part of a relevant filing system or with the intention that it should form part of a filing system).

Relevant Filing System: This refers to any set of information that, while not computerised, is structured by reference to pupils, staff or partners with whom the school has business, so that specific information relating to a particular individual is readily accessible.

Personal Data: This refers to data belonging to an individual who is identifiable by this data or from any other personal data that is in possession of the data controller.

Data Controller: A data controller is the individual or staff which controls the contents and use of personal data. The school itself can be considered the data controller, with the principal acting on behalf of the board of management in exercising the functions involved. The school recognises and accepts its responsibility as set out in the following:

- Data Protection Act 1998 and Data Protection (Amendment) Act 2003.
- Education Act 1998, section 9 (g), requiring a school to provide access to records to parents and to past pupils over 18.
- Education Act 1998, section 22.2 (b), requiring a school to regularly evaluate students and periodically report the results of the evaluation to the students and their parents.
- Education Welfare Act 2000, requiring a school to report school attendance and transfer of pupils.

Gaelscoil na Lochanna (the school) as Data Controller will take all reasonable steps to meet this responsibility and to promote good practice in the handling and use of personal information. In particular, the school will comply with the Data Protection Principles as set out in the Data Protection Acts.

These principles state that data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Used and disclosed only in ways compatible with these purposes
- Adequate, relevant and not excessive.
- Accurate and, where necessary, kept up to date.
- Kept no longer than necessary.
- Processed in accordance with data subjects rights.

- Kept in a safe and secure place.

The Data Controller must give a copy of his/her personal data to an individual on request.

Relationship to the characteristic spirit of the school

Gaelscoil na Lochanna respects the rights of privacy of all those in the whole school community.

Aims of the Policy

- To ensure that the school complies with its legislative obligation.
- To protect the rights and privacy of all those who are the subjects of data that comes into the possession of the school. (Personnel, Pupils, Administration, Board of Management)
- To clarify the types of records maintained and the procedures relating to making them available to the relevant bodies, including parents and past-pupils over 18.

Content of Policy

This policy is divided into two sections as follows:

- A. Details of all personal data which will be held.
- B. Details of the arrangements in place to ensure compliance with the eight rules of data protection.

A. Details of the personal data which will be held.

The data, under the responsibility of the Data Controller(s), comes under the following headings:

1. Sensitive Personal Data

- Religious Belief
- Staff medical certificates and correspondence from Medmark group
- Pupil medical certificate
- Data relating to child protection

2. Personal Data

- Enrolment Data: This data relates to personal details of the students such as name, address, date of birth, gender, dietary information, PPSN.
- Staff Data

This includes names, addresses, PPSN, contact details, payroll number, CVs, attendance records and copies of employment contracts.

- Parent/Guardian Data

This includes details listed on a pupil's enrolment form and payments made to the school.

- Other

This includes CVs on file, submitted by persons applying for work experience/substitute work.

3. Pupil Records

- Results of teacher designed tests
- Standardised tests results
- Copy of IEP (Individual Education Plan for pupils with Special education Needs)
- Behaviour plan and classroom support plans (where necessary)
- Confidential reports

- Correspondence from parents
- Copy of court orders re access
- Copy of end of year report
- Approval of resources from NCSE
- Records of breaches of serious or gross misbehaviour
- Records of meetings between Principal and parents
- Administration of medicine indemnity form
- Letters of transfer
- Copies of correspondence that have been sent to external agencies.

4. Administrative Data

- Incident Report Book
- Yard diaries (record of incidents on the yard)
- Roll books and registers

5. Board of Management

The minutes folder of The Board of Management records the decisions reached by the Board in the discharge of its statutory duty.

The minute folder also includes:

- correspondence of a non routine nature received and discussed by The Board,
- copies of the Financial reports presented to the Board,
- copies of the Principal's reports presented to the Board.
- Any other documentation that the Board, in its absolute discretion, deems appropriate to be included in the minute folder.
- Complaints presented to the Board and all subsequent correspondence
- Payroll Data
- Financial Data

Disclosure of records

Elements of the data listed above may be disclosed, where relevant and appropriate, with the consent of the data controller to the following:

- Parents/guardians, past pupils over 18.
- School staff
- Outside agencies such as the DES, HSE (these include the NCSE)
- Other schools to which pupils are transferring

Parental authorisation will be sought in advance of release of data to outside agencies.

Outside agencies requesting disclosure of data Must do so in writing.

Parents/ Guardians must also make such a request in writing to the Data Controller.

Responding to requests

The data controller will respond to requests within 40 days of receipt of request.

B. A list of the eight rules of data protection

1. Obtain and process information fairly.
2. Keep it only for one or more specified, explicit and lawful purposes.
3. Use and disclose it only in ways compatible with these purposes.

4. Keep it safe and secure.
5. Keep it accurate, complete and up to date.
6. Ensure that it is adequate, relevant and not excessive.
7. Retain it for no longer than is necessary for the purpose or purposes.
8. Give a copy of his/her personal data to that individual on request.

Guidelines on Retention time for Data

All data will be retained for the duration of a pupil's enrolment / staff employment and for an additional period of between 1 and 8 years. In certain circumstances some data may be retained indefinitely.

Personal Data and Pupil records

The following will be kept for 8 years after the pupil leaves the school (when the past-pupil is 21 years of age):

- End of year report from each year in school
- Standardised test results from each year in school
- Copy of most recent professional reports from outside agencies
- Copies of Individual Education Plans
- Records held by the principal in relation to child protection/child welfare will be held indefinitely

Retention time for Administrative Data

- Yard book, Incident Report Book and record sheets of fire drills will be kept for 8 years
- Staff records will be retained for 5 years following their departure and then will be shredded
- Records in relation to staff welfare will be held for 8 years
- Records for employees of the Board of Management will be retained for 8 years
- Record on school accounts (office accounts) will be kept for 8 years
- Applications/CVS submitted for work experience will be shredded at end of current year
- Roll books will be kept forever

Retention time for Board of Management Data

The minute book of the Board of Management meetings will be held indefinitely.

Storage

Data that is to be stored for 8 years will be stored in a secure location and will be accessible by designated personnel only.

Data stored on computers is password and firewall protected.
Passwords should be changed regularly.

Implementation Date

This new policy is effective from May 2016 following ratification by the Board of Management. All data that is designated for long term storage will be transferred to a secure location. Thereafter, at the commencement of each new school year, data that is in excess of 8 years will be destroyed and the relevant long term storage data from the previous school year will be placed in storage.