Polasaí Cosaint Sonraí *Data Protection Policy*

Réamhrá *Introduction*

Cuireann Gaelscoil an Chuilinn oscailteacht agus comhoibriú chun cinn idir an fhoireann, na tuismitheoirí agus na daltaí mar bhealach chun timpeallacht slán a chur ar fáil inar féidir le páiste forbairt agus barr a chumais a bhaint amach. Is fusa é seo a bhaint amach má tá oscailteacht, trédhearcacht agus comhoibriú ann idir an fhoireann, na tuismitheoirí, na daltaí agus páirtithe leasmhara eile.

Cheap Foireann agus Bord Bainistíochta Gaelscoil an Chuilinn an beartas d'fhonn na taifid is gá a choimeád a shainaithint agus d'fhonn rúndacht agus nósanna imeachta soláimhsithe a chinntiú. Baineann na nósanna imeachta leis an rochtain a bhíonn ag tuismitheoirí, daltaí agus páirtithe leasmhara ar dhoiciméid den chineál sin agus le stóráil shábháilte na sonraí. Rinneadh uas-dhátú ar an bpolasaí de réir (GDPR)~~Rialacha~~ Cosaint Sonraí ~~Ghinearálta~~ atá i bhfeidhm ón 25ú Bealtaine 2018.

Gaelscoil an Chuilinn promotes openness and co-operation between staff, parents and pupils as a means towards providing a caring environment through which a child can develop and grow to his or her full potential. This can best be achieved where there is openness, transparency and co-operation between staff, parents, pupils and other stakeholders.

~~1.~~ *This policy was formulated by Staff and Board of Management of Gaelscoil an Chuilinn to identify the records required to be retained by the school to achieve this and to ensure confidentiality and manageable procedures in relation to access to such records by parents, pupils and stake holders and the safe storage of such data. The policy was updated to reflect the new General Data Protection Regulations (GDPR) active from May 25th 2018.*

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Dá mba rud é go bhfuil difríocht idir a bhfuil scríofa as Gaeilge agus as Béarla sa pholasaí seo, glactar leis an leagan Gaeilge mar an leagan cruinn agus an leagan Béarla mar aistriúchán.

- *Should there be any discrepancy between the Irish and English in this policy, it is accepted that the Irish is the correct version and the English is provided as a translation.*

Réasúnaíocht *Rationale*

- Riachtanas is ea beartas um chosaint sonraí agus choimeád taifead chun a chinntiú go bhfuil nósanna imeachta oiriúnacha curtha i bhfeidhm ag an scoil maidir le freagracht agus trédhearcacht;

- Is nós maith é taifead a choimeád ar dhul chun cinn dalta ar mhaithe le riachtanais fhoghlama a shainaithint;

- Caithfear beartas a chur i bhfeidhm chun a chinntiú go gcomhlíonann Gaelscoil An Chuilinn an reachtaíocht chomh maith le h-imlitreacha na roinne, mar shampla;

    - An tAcht Oideachais, Alt 9(g) a éilíonn go dtabharfaidh scoil rochtain ar thaifid do dhaltaí thar 18 mbliana d'aois agus a dtuismitheoirí;

    - An tAcht Oideachais (Leas) 2000 - lena n-áirítear forálacha a éilíonn go gcuirifidh scoil tuairisc ar fáil maidir le tinreamh, aistriú daltaí go scoileanna eile agus cumarsáid leis an Oifigeach Leasa Oideachais;

    - An tAcht um Chosaint Sonraí 1998 agus an tAcht um Chosaint Sonraí (Leasú) 2003;

    - Imlitir 0056/2011 - maidir le cur i bhfeidhm Straitéis Litearthachta agus Uimhearthachta Náisiúnta a bhaineann le Measúnú;

    - Imlitir 0024/2013 - maidir le córas na n-éileamh ar líne i mbunscoileanna aitheanta.

    - 0025/2015 - Príomhbhunachar Sonraí ar Líne

    - (GDPR) Cosaint Sonraí 25ú Bealtaine 2018

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- *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 and departmental circulars such as;*

~~2.~~1. *Education Act, Section 9(g) requiring a school to provide access to records to students over 18 and their parents;*
~~3.~~2. *Education Welfare Act 2000 – including provisions requiring a school to report school attendance, the transfer of pupils to other schools and communications with the Education Welfare Officer ;*
~~4.~~3. *Data Protection Act 1998 and the Data Protection (Amendment) Act 2003;*
~~5.~~4. *Circular Letter 0056/2011 -regarding the implementation of the National Literacy and Numeracy Strategy regarding Assessment;*
~~6.~~5. *Circular Letter 0024/2013 -regarding the online claims system in recognized primary schools.*
6. *0025/2015 Primary Online Database (POD).*
7. *General Data Protection Regulation (GDPR)*

Aidhmeanna agus Sainchuspóirí *Aims and Objectives*

- Tuiscint a shoiléiriú - i gcomhairle leis an bhfoireann, leis na tuismitheoirí agus leis an mbainistíocht - ar na cineálacha taifead dalta a choimeádtar agus conas is féidir na taifid seo a chur ar fáil.

- Tuiscint a shoiléiriú - i gcomhairle leis an bhfoireann agus leis an mbainistíocht - ar na cineálacha taifead foirne a choimeádtar agus conas is féidir na taifid seo a chur ar fáil.

- Chun a chinntiú go gcomhlíonann Gaelscoil an Chuilinn na riachtanais reachtaíochta maidir le teidlíochtaí na ndaltaí, na foirne agus baill eile chomhphobal na scoile ar chosaint sonraí.

- Taifid chuí maidir le dul chun cinn oideachasúil na ndaltaí a chur ar bun, rud a fhágann go mbeidh tuismitheoirí agus na baill foirne ábalta cuidiú le foghlaim an pháiste i mbealach fiúntach agus éifeachtach; agus a chinntiú go mbainfidh daltaí leas as múinteoireacht bhreise chuí agus tacaíocht airgeadais.

- Tuairiscí ar dhul chun cinn oideachasúil an pháiste a thabhairt do na tuismitheoirí ar bhealach bríoch.

- Treoirlínte follasacha a bhunú ar conas na taifid sin a chur ar fáil do thuismitheoirí, páirtithe leasmhara agus iardhaltaí (thar 18 mbliana d'aois).

- Coinníollacha a leagan amach maidir leis an achar ama a gcoimeádfar na taifid agus na tuairiscí agus an modh ina gcoimeádfar iad.

- *To establish a clear understanding in consultation with staff and management as to the type of staff records that are maintained and how such records should be made available;*
- *To ensure that Gaelscoil an Chuilinn complies with legislative requirements regarding the data protection entitlements of pupils, staff and other members of the school community;*
- *To put in place proper records on the educational progress of pupils thereby enabling parents and staff to support a child's learning in a meaningful and constructive manner and to ensure that eligible pupils benefit from relevant additional teaching and financial supports;*
- *To report to parents in a meaningful way on the educational progress of their pupils;*
- *To establish clear guidelines on making these records available to parents, stakeholders and past pupils (over 18);*
- *To stipulate the length of time records and reports will be retained and the manner in which they will be retained.*

Na hOcht Rialacha Cosanta Sonraí *The Eight Rules of Data Protection*

- Bailigh agus próiseáil na sonraí go cóir, cothrom.
- Ná coimeád na sonraí ach amháin le haghaidh críche sonraithe, sainráite agus dleathaí amháin nó níos mó.
- Ná húsáid agus ná nocht na sonraí in aon slí a bheidh neamhréir leis na críocha sin.
- Coinnigh slán sábháilte an t-eolas agus na sonraí.
- Bíodh na sonraí beacht, comhlán agus suas chun dáta.
- Déan cinnte de go bhfuil na sonraí leordhóthanach, ábhartha gan a bheith iomarcach.
- Ná coimeád na sonraí níos faide ná mar is gá.
- Tabhair cóip de shonraí pearsanta an duine aonair dó/di má iarrann sé/sí sin.

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 the information for no longer than is necessary.*
8. *Give a copy of his/her personal data to that individual on request.*

Scóip *Scope*

Sonraí: Ciallaíonn sin faisnéis i bhfoirm inar féidir í a phróiseáil. Áirítear ann sonraí uathoibrithe (faisnéis ar ríomhaire nó faisnéis a taifeadadh chun í a chur ar ríomhaire ar ball) agus lámhshonraí (faisnéis a choimeádtar mar chuid de chórás 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 Oifigeach Cosaint Sonraí.

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

Data: What is meant by data is information collected 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~~Protection Officer.

Data Protection Officer: A data Protection Officer is the individual or staff which controls the contents and use of personal data. The school Board of Management can be considered the data ~~controller~~ protection officer, with the principal acting on behalf of the Board of Management in exercising the functions involved.

Treoirlínte *Guidelines*

Glacann an Príomhoide ról an Oifigeach Cosaint Sonraí agus déanann sé maoirseacht ar chur i bhfeidhm na reachtaíochta maidir le cosaint sonraí laistigh den scoil. Roinntear na sonraí atá faoi chúram an Phríomhoide faoi na fo-theidil seo a leanas:

(i) Sonraí Pearsanta:

Baineann na sonraí sin le sonraí pearsanta na ndaltaí, mar shampla, ainm, seoladh, dáta breithe, inscne, náisiúntacht, bunadh eitneach (roghnaitheach), creideamh (roghnaitheach), sonraí leighis, eolas ar réim bia, UPSP, sonraí theagmhála agus ainmneacha na dtuismitheoirí.

Coimeádtar na taifid sin i bhfoirm páipéir i gcófra faoi ghlas san oifig, agus i bhfoirm leictreonach ar bhunachar sonraí na scoile – is é sin Aladdin i láthair na huaire. Tá fáil ag an bPríomhoide, an rúnaí agus an Chathaoirleach orthu más gá.

(ii) Taifid na nDaltaí:

MR = Múinteoir Ranga; CTF = Co-ordaitheoir Tacaíocht Foghlama; MTF = Múinteoir Tacaíocht Foghlama
P.O = Oifig an Phríomhoide; R = Oifig an Rúnaí; AL = Aladdin; SF = Seomra Foirne MA = Múinteoir Achmhainne

Is éard atá i dtaifid na ndaltaí:

- Sonraí pearsanta an dalta mar a leagtar amach thuas (R) (MR) agus (AL)
- Sonraí leighis atá íogair (AL) agus (SF)
- Cártaí tuairisce scoile (MR) agus (AL)

- Measúnuithe Síceolaíocha/Cliniciúla/Teiripe Shaothair/Cumas Cainte agus Teanga (CTF) agus (P.O)
- Torthaí na dTriallacha Chaighdeánaithe (MR) agus (AL)
- Taifid Thinrimh (AL) agus (MR)
- Triail Scagtha, mar shampla, MIST agus NRIT (MTF) (MR) agus (AL)
- Trialacha ceaptha ag múinteoirí. Ceapann gach múinteoir ranga a theimpléad nó a teimpléad féin le haghaidh trialacha (MR)
- Torthaí ó Thástálacha Diagnóiseacha (MTF) agus (MR)
- Pleananna Oideachais Aonair (MTF) agus (MR)
- Sonraí ar Thacaíocht Foghlama/Acmhainní, mar shampla, taifid de chead/diúltiú fáil ar sheirbhísí Tacaíocht Foghlama/Acmhainní sa scoil (P.O) agus (MA)
- Fillteáin thionscadail na ndaltaí (MR)
- Eolas teaghlaigh iomchuí, mar shampla, Orduithe Cúirte a bhaineann le caomhnóireacht etc. (P.O)
- Sonraí maidir le teagmhais iompraíochta nó timpistí. (P.O)
- Foirm Sínithe cead a thabhairt an dalta a iompar ar thuras scoile/ griangraifeanna a ghlacadh/ an idirlíon a úsáid. (P.O) (R)

Coimeádann gach múinteoir ranga taifid na ndaltaí agus tá bunchóip á choimeád sna seomraí tacaíochta foghlama. Chomh maith leis sin, baintear úsáid as bunachar sonraí scoile ríomhairithe.

(iii) Sonraí Baill Foirne:

Baineann na sonraí seo le heolas pearsanta agus proifisiúnta na baill foirne, mar shampla, ainm, seoladh, dáta breithe, sonraí theagmhála, uimhir phárolla, taifid thinrimh, cáilíochtaí, taifid scoile, saoire bhreoiteachta, Teastais ón gComhairle Múinteoireachta, Teastais Ghrinnfhiosrúcháin, Forbairt Leantach Ghairmiúil, CV, tuairisceáin scoile, ranganna a múineadh agus sinsearacht.

Coimeádtar na taifid seo i gcófra faoi ghlas in oifig an rúnaí agus tá fáil ag an gCathaoirleach agus an Príomhoide orthu.

(iv) Sonraí Riaracháin:

Is éard atá sna sonraí seo:

- Leabhar Tuairisce ar Thimpiste
- Riar Foirme Slánaíochta Leigheasanna
- Polasaithe
- Comhaid FSS
- Cuntaisí

- Tuairiscí Tinrimh

Coimeádtar cuid de na taifid seo i bhfoirm páipéir in oifig an rúnaí, cuid eile in oifig an Phríomhoide. Coimeádtar cuid dóibh i bhfoirm leictreonach ar bhunachar sonraí na scoile – is é sin Aladdin i láthair na huaire.

(v) Comhaid an Bhoird Bhainistíochta:

Comhaid an Bhoird Bhainistíochta lena n-áirítear na sonraí seo a leanas de ghnáth:

- ainmneacha agus sonraí theagmhála gach ball den Bhord
- sonraí chruinnithe an Bhoird;
- cuntais scoile, íocaíochtaí deontais, íocaíochtaí síntiúis scoile etc.
- Miontuairiscí chruinnithe an Bhoird
- Comhfhreagras don Bhord ina bhféadfaidh tagairtí do dhaoine aonair a bheith san áireamh

Coimeádann an Príomhoide, an Cathaoirleach nó an Rúnaí na taifid i bhfoirm páipéir agus tá siad ar fáil i bhfoirm leictreonach ar ríomhaire an Phríomhoide.

(vi) Polasaí Iniúchadh na nGardaí

Mar chuid de pholasaí Iniúchadh na nGardaí, déantar iniúchadh ar thuistí trí Phátrún na scoile, a bheadh teagmháil acu le páistí scoile agus iad ag tacú leis an scoil i rólanna éagsúla. Tá an teolas a bhailítear príomháideach agus rúnda agus is é an príomhoide agus duine ainmnithe ón mBord Bainistíochta a fheicteann an teolas amháin a thagann arais ó Phátrún na scoile. Tá an teolas seo dhá stóráil in oifig an phríomhoide. Tá níos mó eolas ar fáil i bPolasaí Iniúchadh na nGardaí scoile.

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

(i) Personal Data:

This data relates to personal details of pupils such as name, address, date of birth, gender, nationality, medical details, dietary information, PPSN, contact details and parents' names. Parents/Guardians reserve the right not to disclose details related to ethnic origin/ background or religious beliefs.

These records are retained in both manual form in a locked press in the Oifig an Rúnaí and in electronic form on the school database which is currently Aladdin.

(ii) Pupil Records:

CT = Class Teacher; LSC = Learning Support Co-ordinator; LST = Learning Support Teacher; PO= Principal's Office; S = Secretary; AL = Aladdin; SR = Staffroom; RT = Resource Teacher DLP = Designated Liaison Person

Pupil records may contain:

- *Personal data of the student as outlined above (S0, (CT) (AL)*
- *Medical sensitive data (S) (AL) (CT)*
- *School report cards (CT) (AL)*
- *Psychological/Clinical/Occupational Therapy/Speech and Language Assessments (LSC) (P.O)*
- *Standardized Test Results (CT) (AL)*
- *Attendance Records (AL) (CT)*
- *Screening Test such as Middle Infant Test (MIST) and National Reading Intelligence Test (NRIT) (LST) (CT) (AL)*
- *Teacher – designed tests. Each class teacher designs his/her own test template (CT)*
- *Diagnostic Tests Reports (LST) (CT)*
- *Individual Education Plans (LST) (CT)*
- *Learning Support/Resource Data such as records of permission/refusal to access Learning Support (LS)/ Resource Teaching (RT) services in the school (RT) (P.O)*
- *Portfolios of student work (CT)*
- *Relevant family information such as Court Orders re custody etc. (P.O -DLP)*
- *Details of behavioral incidents or accidents. (P.O - DLP)*
- *Photographs/School Tours/use of internet at school - parents/guardians sign a consent form when a child becomes enrolled in the school allowing their child access.*

Pupil records are held by each class teacher in a locked cabinet. A computerized school database is also used. Psychological/Clinical/Occupational Therapy/Speech & Language Assessments are held in a locked cabinet in the Learning Support Co- ordinator's office, ~~Resource Teacher's office~~ as well as the Principal's office.

(iii) Staff Data:

This data relates to personal and professional details of the Staff such as name, address, date of birth, contact details, payroll number, attendance records, qualifications, school records,

sick leave, Teaching Council Certificates, Vetting Certificates-, Continuous Professional Development, curriculum vitae, school returns, classes taught, seniority and supervision payments.

Staff records are held in a locked cabinet in the secretary or the principal's office. The Chairperson the Principal and the School Secretary have access to these records.

(iv) Administrative Data:

This data includes data such as:
•Accident Report Book
•Administration of Medicines Indemnity Form
•Policies
•Health Service Executive files
•Accounts
•Attendance Reports, Roll Book, Registers

These records are retained in both manual form in Oifig an Rúnaí, oifig an Phríomhoide and in electronic form on the school database which is currently Aladdin. ~~Roll Books are stored in locked drawers in each classroom.~~

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(v) Board of Management files:

Board of Management files which may routinely include:

•The names and contact details of each member of the Board
•details of appointments to the Board;
•School accounts, grant payments, school subscription payments etc. •Minutes of Board meetings
•Correspondence to the board which may include references to individuals

These records are retained in the Principal's office in manual form. The Principal, Secretary, Chairperson and the Treasurer have access where appropriate. Some of these data are stored in electronic form on the school server.~~principal's computer~~.

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(vi) Garda Vetting Policy

As a part of our Garda Vetting Policy, parents who wish to volunteer their services to the school that may involve direct contact with school children must be vetted through the school

Patron. The information that is collected and subsequently returned to the school by the Patron body is private and sensitive and can only be seen by the school Principal and another named individual on the school Board of Management. This information is stored in the Principal's office. For more information, see our school Garda Vetting Policy.

Fáil ar thaifid *Access to Records*

Beidh fáil ag na grúpaí seo a leanas ar na sonraí leagtha amach thuas i gcás inarb ábhartha agus iomchuí;

- Tuismitheoirí/caomhnóirí
- Iardhaltaí thar 18 mbliana d'aois
- Feidhmeannacht na Seirbhíse Sláinte (FSS)
- Pearsanra scoile ainmnithe thuas
- Roinn Oideachais agus Scileanna
- Bunscoileanna agus scoileanna dara leibhéal (i gcás inarb iomchuí).

Caithfidh tuismitheoirí cead a thabhairt i bhfoirm scríbhinn nó trí ríomhphost a sheoladh sa chás go n-aistrítear sonraí go gníomhairí lasmuigh, mar shampla, gairmithe sláinte etc. Más mian le gníomhairí lasmuigh fáil ar thaifid a iarraidh, caithfidh siad an t-iarratas a chur isteach i scríbhinn~~ agus fógra seachtaine a thabhairt~~. Tá an ceart chun scriosta agus coigeartaithe sonraí ann más gá aon earráidí a cheartú – déantar é seo de réir an údairaithe chuí agus na nósanna imeachta céanna i scríbhinn chuig an tOifigeach Cosaint Sonraí.

Ag Freagairt d'Iarratais
Tabharfaidh an Oifigeach Cosaint~~Rialaitheoir~~ Sonraí freagra d'iarratas laistigh de 3~~4~~0 lá den iarratas.

Tuairiscí Scoile Bliantiúla – Úsáidtear foirm thuairisce scoile chaighdeánaithe agus déantar é seo a eisiúint i Mí an Mheithimh.

The following will have access where relevant and appropriate to the data listed above;

- *Parents/guardians*
- *Past pupils over 18*
- *Health Service Executive*
- *Designated school personnel (as specified above)*
- *Department of Education & Skills*

- *First and second-level schools (where relevant).*

Parental ~~authorization~~ consent must be given in the event of data being transferred to outside agencies such as health professionals etc. Parents/Guardians must give~~can~~ such consent~~make such a request~~ ~~either by email or~~ in writing. Outside agencies requesting access to records must do so in writing ~~giving seven days notice~~. The right to erasure or rectification of inaccurate information is available ~~to change any mistakes or inaccuracies~~ by request in writing to the data protection officer. ~~proper authorization through the same procedures.~~

Responding to Requests:
The Data Protection Officer will respond to requests within ~~4~~30 days of receipt of request.

The Annual School Report Form:

A standardized school report form is used which is issued in June of each year.

Stóráil *Storage*

(ii) Cuirtear taifid uile na ndaltaí i dtaisce sa scoil ar feadh ocht ~~líon áirithe~~ mbliana théis don phaiste an scoil a fhágail. ~~go dtí go slánaíonn an t-iardhalta aois 25.~~ Coimeádtar na taifid i gcomhad atá laistigh de sheomra stórais agus ar bhunachar sonraí na scoile. Féach Aguisín a 1.Tá na taifid agus na córais ríomhairithe cosanta le pasfhocal.

(iii) Cuirtear taifid gach ball foirne i dtaisce sa scoil ar feadh tréimhse éiginnte agus/nó de réir treoirlínte Aguisín a 1~~na roinne~~.

(iv) Cuirtear na taifid eile i dtaisce de réir treoirlínte na roinne;

(v) Coimeádann gach múinteoir próifíl den dalta agus roinnt taifead ina s(h)eomra ranga f(h)éin agus cuirtear ar aghaidh iad chuig an gcéad mhúinteoir eile nuair a bhogann an dalta go dtí an chéad rang eile.

(vi) Coimeádtar na leabhair rolla líonta ar fad in áit den chineál céanna, chomh maith le samplaí d'obair na ndaltaí agus próifílí na ndaltaí.

(vii) Déantar dramhpháipéir/asphriontaí a stialladh/a dhiúscairt go cúramach.

(viii) Tá fáil ag pearsanra údaraithe amháin ar na taifid stóráilte.

Nóta: tá tuilleadh eolas faoi stóráil agus tréimhsí ama ar Agiúsín 1.

(i) *All pupil records are stored in the school for 8 years after the pupil has left the school ~~until the past pupil reaches the age of 25~~. R~~These r~~ecords are retained on the school database. Other documents/ reports are stored indefinitely ~~stored~~ in secure storage on the school premises (see Appendix 1). ~~a locked room~~ Access to ~~in filing boxes and retained on the school database.~~ c~~C~~omputerized records~~, systems~~ are password protected.*

(ii) *All staff data is stored as per Appendix 1 ~~d indefinitely~~ , ~~within the school and/or in line with departmental guidelines.~~*

(iii) *All other data is stored in line with departmental guidelines;*

(iv) *A pupil profile and selection of records are held by each~~h~~ teacher in his/her individual classroom and passed on to the next teacher as the child moves to the next class.*

~~***(vi)*** *All completed school roll books are stored in the Learning Support Co-ordinator's room.~~

~~*(vii)*~~*(vi)* *All waste paper /printouts are ~~shredded/disposed of carefully~~destroyed before disposal;*

~~*(viii)*~~*(vii)* *Access to these stored files is restricted to authorized personnel only.*

NB: Please refer to Appendix 1 for more detailed information re: Recommendations regarding Safe storage and retention periods for different information.

Stórais Sonraí Leictreonach. *Electronic Data Storage*

Déanfar sonraí na scoile a stóráil den suíomh ag comhlacht atá fostaithe, ar nós Aladdin atá in úsáid faoi láthair. Slánófar méid áirithe sonraí leictreonach sa scoil. Déanfar cinnte go bhfuil an teolas seo sábháilte agus criptiú déanta air. Déanfar athstórail ar eolas/sonraí chuig an gcomhlacht atá fostaithe ag an scoil. Déanfar cinnte go bhfuil criptiú déanta agus an teolas á sheoladh agus arís fad is atá sé i dtaisce.

The school's database will be hosted off the premises by a contracted third-party (currently Aladdin). A limited set of electronic records will be held in the school. The storage appliances for these records will be secured in the building and the storage media encrypted. Backups will be made to an off-site (cloud-based) provider. These backups will be encrypted in transit (over the internet to the provider) and at rest (stored on the provider's appliances).

Traenáil Foirne *Staff Training*

Déanfar traenáil foirne ar dhualgaisí cosaint sonraí ag tús gach scoil bhliain.

A staff training session on Data Protection policies and procedures will be delivered in term 1 of every academic year.

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Tuairisciú Sarú Sonraí *Data Breach Reporting*

Má dhéantar sárú ar pholasaí chosaint sonraí na scoile, déanfaidh Bord Bainistíochta na scoile ~~,~~ an scéal a fhiosrú ~~ag an mBord Bainistíochta~~. Má dhéantar sarú nó má chailltear sonraí pearsanta ón scoil, déanfar é a thuairisciú chuig Oifig an Chomisinéir Cosaint Sonraí taobh istigh de 72 uair a chloig, fiú muna bhfuil an himscrúdú curtha i gcríoch. Má cheaptar go dtiocfadh dochar do dhuine de bharr cás sarú sonraí, cuirfear ar an teolas an duine chomh luath agus is féidir.

Any breach of the school's data protection policies and procedures will result in an investigation by the Board of Management. If the breach results in the loss or leakage of personal data it will be reported to the Office of the Data Protection Commissioner within 72 hours, even if the investigation is not yet complete. Breaches that are likely to bring harm to an individual – such as identity theft or breach of confidentiality – will also be notified directly to the individuals concerned.

Córas Slándála Teilifíse *Closed Circuit Television*

- Déantar córais CST a lonnú sna háitribh ar an taobh amuigh d'fhonn slándáil an fhoirgnimh agus na dtrealamh a bhaineann leis a neartú.
- Is 'sonraí pearsanta' iad na híomhánna inaitheanta a ghlacann córais CST. Dá bharr sin, tá siad faoi réir coinníollacha na nAchtanna um Chosaint Sonraí, 1988 agus 2003.
- Tá údar tugtha ag an mBord Bainistíochta le húsáid CST chun imlíne fhoirgnimh na scoile a rialú chun críoch slándála. Tá an córas ann chun íomhánna a ghlacadh d'ionróirí nó daoine aonair a dhéanfadh damáiste do threalaimh nó a bhainfeadh earraí gan cead. Is bealach é an CST chun cuidiú le slándáil phearsanta daoine a bhfuil cead acu teacht ar shuíomh na scoile.
- Dá réir sin, coimeádfar na híomhánna a ghlacann córas CST ar feadh míosa, ach amháin i gcás go sain-aithnítear saincheist in íomhá ar leith agus coimeádtar an íomhá chun iniúchadh/ionchúiseamh a dhéanamh maidir leis an tsaincheist sin.

- *A CCTV system operates on the school grounds in order to enhance the security of the premises.*
- *The recognizable images recorded by CCTV constitute 'personal data' and therefore come under the Data Protection Acts 1988 and 2003.*
- *The Board of Management of Gaelscoil An Chuilinn have authorized the use of CCTV in order to protect the school grounds, the school buildings and its contents from*

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vandalism and theft. The system also acts as a measure to enhance the personal security of all ~~authorized~~ persons entering the school grounds.

- *Accordingly images recorded by the CCTV system shall be retained for one month except where an issue arises in relation to a particular image in which case the image shall be retained until the issue has been investigated or resolved.*

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Cead Griangraif *Consent for Photographs*

Lorgítear cead ó thuistí nuair atá siad ag clárú a bpáiste sa scoil leis an tuiscint go nglacfar grianghriaf dá bpáiste ag ócáidí / gníomhaíochtaí scoile agus go n-úsaidfí é sna meáin shóiseálta scoile. Is féidir aistarraingt a dhéanamh ar an gcead sin ag am ar bith trí scríbhinn chuig Bord Bainistíochta na scoile.

On enrolment, written consent from parents for pupils to appear in photographs taken at school events with the possibility they may appear on social media is sought. The consent may be withdrawn at any time by notifying the Board of Management in writing.

Coiste na dTuistí *CAIRDE Parents' Association*

Tá dualgaisí chosaint sonraí ar Choiste na dTuistí agus comhairle faighte acu ón NPC ina leith. Bíonn grúpaí ranga 'WhatsAp' i bhfeidhm ag Coiste na dTuistí (CAIRDE) chun eolas a scaipeadh go héasca ar na tuistí sa ghrúpa. Lorgófar cead i bhfoirm scríbhinn ó na tuistí chun iad a chur sa ghrúpa. Is féidir aistarraingt a dhéanamh ar an gcead sin ag am ar bith trí scríbhinn chuig cathaoirleach CAIRDE.

The Parents' Association (CAIRDE) equally have data protection requirements to meet under the guidance of the National Parents Council (NPC). The Parents' Association organise class 'Whats Ap' groups for ease of sharing information etc. at each class level. Permission is sought in writing from the parents of each group. Consent may be withdrawn at any time by notifying the chairperson of CAIRDE in writing.

Critéir Reatha *Success Criteria*

- Comhlíonadh na nAchtanna Cosaint Sonraí agus Reacht na dTréimhsí
- Fáil éasca ar thaifid
- Creat curtha ar bun ar mhaithe le héascaíocht tiomsaithe agus tuairiscí a thabhairt
- Stóráil taifead soláimhsithe

- *Compliance with Data Protection Act and Statute of Limitations Act*
- *Easy access to records*
- *Framework in place for ease of compilation and reporting*
- *Manageable storage of records.*

Rólanna & Freagrachtaí *Roles and Responsibilities*

Cuirfidh foireann na scoile, faoi stiúir an Phríomhoide, an polasaí i bhfeidhm agus déanfaidh siad monatóireacht air. Déanfaidh gach múinteoir na trialacha ranga ar fad a cheapadh, a thabhairt amach agus a thaifead. Déanfaidh an Príomhoide cinnte go gcoimeádtar na taifid agus go gcuirtear i dtaisce iad, go háirithe taifid na ndaltaí a aistreoidh go scoileanna eile.

The school staff, under the direction of the Principal will implement and monitor this policy. Individual teachers will design, administer and record all in-class testing. The Principal will ensure records are maintained and stored, particularly the records of students transferring to another school.

Athbhreithniú *Review*

Déanfar athbhreithniú ar an bpolasaí seo gach dara bliain nó mar is gá.
This policy will be reviewed every second year or earlier if the need arises.

Daingniú agus Cumarsáid *Ratification and Communication*

Rinneadh ath-bhreithniú ar an bpolasaí seo ar an 23ú Bealtaine 2018.~~Tá an polasaí seo dhá chur i bhfeidhm ó mí Eanáir 2016.~~ Cuirfear cóip den pholasaí seo ar fáil do gach ball foirne agus do gach tuismitheoir trí shuíomh idirlín na scoile.

This~~-~~ policy was updated to reflect new GDPR regulations~~changes~~ on May 23rd 2018.~~policy was implemented in January 2016.~~ A copy of this policy will be made available to each member of staff and each parent through the school website.

Sínithe: _____ Dáta: _____
Cathaoirleach