



POLASAÍUM CHOSAINSONRAÍ

Data Protection Policy

2021

Leagan 1 Lúnasa 2021



RÉAMHRÁITEAS AGUS RÉASÚNAÍOCHT

Baineann Polasaí um Chosaint Sonraí na scoile le sonraí pearsanta a choimeádann Bord Bainistíochta (BB) na scoile, atá cosanta ag na hAchtanna um Chosaint Sonraí 1998 go 2018 agus Rialachán Ginearálta um Chosaint Sonraí (RGCS) an Aontas Eorpaigh.

Baineann an polasaí seo le foireann uile na scoile, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus daoine eile (daltaí ionchasacha nó féideartha agus a dtuismitheoirí/a gcaomhnóirí agus iarratasóirí ar phoist foirne laistigh den scoil) sa mhéid go mbaineann na bearta faoin bpolasaí leo. Stórálfar sonraí go slán, ionas go gcosnaítear faisnéis rúnda i gcomhlíonadh na reachtaíochta ábhartha. Leagtar amach sa pholasaí seo an bealach ina gcosnóidh an scoil sonraí pearsanta agus sonraí íogaire. Déileáilann an polasaí seo plé le sonraí atá cláraithe ar pháipéar agus atá cláraithe ar an ríomhaire.

Cuirtear an módh 'Príobháideachas d'Aonghnó' i bhfeidhm i nGaelscoil Lir i dtaca le Cosaint Sonraí. Ciallaíonn sé seo go ndéantar pleanáil chúramach agus sonraí pearsanta á mbailiú lena chinntiú gur cuid d'ílís iad na pionsabail um chosaint sonraí d'aon chóras bailithe sonraí a cuirtear i bhfeidhm.

Déantar iniúchadh ar na sonraí pearsanta a coiméadtar le

- go mbeidh fáil ag daoine aonair ar a gcuid sonraí pearsanta
- cinntiú go gcoinnítear iad go slán, sábháilte
- modhanna um chosaint sonraí a chlárú
- reagracht & trédhearcacht a fhorbairt

PRIONSABAIL um CHOSAINT SONRAÍ

Rialaitheoir sonraí is ea an Bord Bainistíochta ar shonraí pearsanta a bhaineann lena bhfoireann, daltaí, tuismitheoirí/caomhnóirí agus daoine eile de phobal na scoile reatha agus roimhe seo agus amach anseo. Tá dualgas ar an scoil, mar dhea, na prionsabail um chosaint sonraí a chomhlíonadh a leagtar amach sna hAchtanna um Chosaint Sonraí, 1988 go 2018 agus RGCS, ar féidir an t-achoiriú a leanas a dhéanamh orthu.

1. Sonraí Pearsanta a fháil & a phróiseáil go cóir: Bailítear faisnéis ar dhaltaí le cabhair ó tuismitheoirí/chaomhnóirí agus ón bhfoireann. Aistríonn na scoileanna ar ar fhreastail na daltaí roimhe seo, faisnéis. i dtaobh faisnéis atá á coimeád ag an scoil ar dhaoine eile (comhaltaí foirne, daoine a dhéanann iarratas ar phoist laistigh den scoil, tuismitheoirí/caomhnóirí daltaí etc.), is gnách go soláthraíonn na daoine an fhaisnéis iad féin le toiliú iomlán agus feasach agus a cuireadh i dtoll a chéile fad a bhí siad fostaithe nó ar conradh leis an Scoil. Caitear leis na sonraí sin go léir i gcomhréir leis na hAchtanna um Chosaint Sonraí agus le téarmaí an Pholasaí um Chosaint Sonraí seo. Déanfar an fhaisnéis seo a fháil agus a phróiseáil go cóir.
2. Toiliú; Más de bhunús toiliú a cuirtear sonraí pearsanta le chéile (m.sh. sonraí atá ag teastáil le bheith ar fhoireann spóirt/imeachtaí iar-scoile nó imeachtaí scoile roghnach ar bith eile) is ceart do thoiliú a bheith soar, feasach agus a bheith aistharraingthe ag aon tráth, gan an duine a bheith thíos le pionós nó le díobháil. Lorgóidh Gaelscoil Lir gníomh dearfach m.sh. tic a chur i mbosca/ doiciméad a shíniú le toiliú a chur in iúl. Tá sé ceadaithe toiliú a tharraingt siar uair ar bith.
3. Ná coimeád na sonraí ach amháin le haghaidh críche sonraithe, sainráite & dleathaí amháin nó níos mó. Cuirfidh an BB daoine ar an eolas ar na cúiseanna a mbailíonn siad a sonraí agus cuirfidh siad daoine ar an eolas ar an úsáid a bhainfidh siad as a sonraí. Coimeádtar an fhaisnéis go léir agus aird ag gach tráth ar shárleas an duine.
4. Gan sonraí a phróiseáil ach ar bhealaí a oireann do na cuspóirí a tugadh i dtosach báire iad: Ní phróiseálfar sonraí a bhaineann le daoine ar bhealach atá ar aon dul leis an cuspóirí a bailíodh iad. Ní nochtfar faisnéis ach ar bhonn riachtanais, agus déanfar rochtain ar an bhfaisnéis a rialú go dian.

INTRODUCTION AND RATIONALE

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 Personal Regulation (GDPR).

The policy applies to all school staff, the Board of Management, parents/guardians, students and other partners with whom the school deals (i.e. 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. This policy deals with data which is both stored on paper and on computers.

Gaelscoil Lir 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

- be able to provide access to individuals to their data
- ensure it is held securely
- document our data protection procedures
- enhance accountability and transparency

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:

1. 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.
2. 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 Lir 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
3. 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.
4. 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

5. Coinnigh Sonraí Pearsanta slán sábháilte. Ní féidir leo siúd ach a bhfuil fíorchúis acu chun amhlaidh a dhéanamh rochtain a fháil ar an bhfaisnéis. Stóráiltear Sonraí Pearsanta faoi ghlas i gcás taifead de láimh & cosnaítear iad le bogearraí ball dóiteáin agus le cosaint phasfhocail i gcás sonraí a stóráiltear go leictreonach. Cosnaítear sonraí pearsanta atá ar ghléasanna iniompartha (ar nós ríomhairí glúine) le pasfhocal.
6. Bíodh Sonraí Pearsanta beacht, comhlán agus suas chun dáta. Ba cheart do dhaltá, tuismitheoirí/caomhnóirí, agus/nó an fhoireann an scoil a chur ar an eolas ar aon athrú ar cheart don scoil a dhéanamh dá sonraí pearsanta agus/nó sonraí pearsanta íogaire lena chinntiú go bhfuil sonraí an duine aonair cruinn, iomlán agus cothrom le dáta. A luaithe a chuirfear ar an eolas iad, déanfaidh an scoil na hathruithe riachtanacha ar na taifid ábhartha. Níor cheart taifid a athrú nó a scriosadh, áfach, gan an t-údarú ceart a fháil. Má theastaíonn athrú/ ceartú, ba cheart don duine a dhéanfaidh an t-athrú sin nóta a dhátú agus a shíniú ina dtugtar an t-údarú sin agus an athrú/na hathruithe atá le déanamh ar aon bhuntaifead/bhuncháipéis.
7. Déan cinnte de go bhfuil na sonraí leordhóthanach, ábhartha gan a bheith iomarcach. Ní bhaileofar agus ní stórálfar ach an méid faisnéise a theastaíonn chun seirbhís leordhóthanach a sholáthar.
8. Gan an fhaisnéis a choimeád níos faide ná mar is gá don chuspóir nó do na cuspóirí sonraithe ar tugadh í Mar riail ghinearálta, coimeádfar an fhaisnéis don fhad a bheidh an duine ag freastal ar an scoil. Ina dhiaidh sin, comhlíonfaidh an scoil treoirilínite na Roinne Oideachais agus Scileanna maidir le Sonraí Pearsanta a stóráil a bhaineann le dalta. I gcás comhaltaí foirne, comhlíonadh an scoil treoirilínite na ROS agus ceanglais na gCoimisinéirí Ioncaim araon maidir le taifid a choimeád a bhaineann le fostaithe. Anuas air sin, féadfaidh an scoil na sonraí a choimeád a bhaineann le duine ar feadh fad níos faide ama chun forálacha ábhartha an dlí a chomhlíonadh agus/nó chun éileamh a chosaint faoin reachtaíocht fostaíochta agus/nó faoi chonradh agus/nó faoin dlí sibhialta. Féach tábla Coinneáil Taifid Scoile.
9. Cóip dá sonraí pearsanta a sholáthar d'aon duine, ar iarraidh sin: Tá an ceart ag daoine fios a bheith acu cén sonraí pearsanta atá á gcoimeád fúthu, cé aige a gcoimeádtar iad agus cén cuspóir dá gcoimeádtar iad agus cóip a fháil dóibh, más mian.

SCÓIP

Baineann an Reachtaíocht um Chosaint Sonraí le sonraí pearsanta a choimeád agus a phróiseáil, i bhfoirm de láimh agus leictreonach araon. Is é cuspóir an pholasaithe seo ná cabhrú leis an scoil a ndualgais reachtúla a chomhlíonadh, na dualgais siúd a mhíniú d'fhoireann na Scoile, agus an fhoireann, na daltaí agus a dtuismitheoirí/a gcaomhnóirí a chur ar an eolas faoi conas a chaithfear lena sonraí.

Baineann an polasaí le foireann uile na scoile, an Bord Bainistíochta, tuismitheoirí/caomhnóirí, daltaí agus daoine eile (daltaí ionchasacha nó féideartha agus a dtuismitheoirí/a gcaomhnóirí, agus iarratasóirí ar phoist foirne laistigh den scoil) sa mhéid go láimhseálann nó go bpróiseálann an scoil a Sonraí Pearsanta i gcaitheamh a ndéileálacha leis an scoil.

Sainmhíniú ar Théarmaí um Chosaint Sonraí

Chun tuiscint cheart a fháil ar dhualgais na scoile i leith Cosaint Sonraí, tá roinnt príomhthéarmaí ann ar cheart d'fhoireann uile na scoile tuiscint a fháil orthu:

Ciallaíonn Sonraí Pearsanta sonraí a bhaineann le duine aonair ata sainaitheanta nó ar féidir é/í a shainaithint cibé acu ó na sonraí i gcomhar le faisnéis eile atá faoi sheilbh, nó ar dócha go mbeidh sí faoi sheilbh na Rialaitheora Sonraí (BB)

Rialathóir Sonraí: Ciallaíonn sé seo duine aonair nó aonán dlí a rialaíonn inneachair agus úsáid sonraí pearsanta. Is é an Bord Bainistíochta an rialaitheoir sonraí, an príomhoide ag feidhmiúar son an Bhoird Bhainistíochta chun na feidhmeanna i gceist a chomhlíonadh.

5. 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.

6. 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.
7. 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.
8. 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 School Record Retention table
9. 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

SCOPE

The Data Protection legislation applies to the keeping and processing of Personal Data, both in manual & electronic form. 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 person 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: A data controller is the individual or legal entity that controls the contents and use of personal data. The Board of Management itself is the data controller, with the principal acting on behalf of the BOM in exercising the functions involved.

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 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.

An Duine is Ábhar do na Sonraí: An té is ábhar do na sonraí pearsanta

Próiseáil Sonraí: Aon phróiseáil a déantar ar shonraí, ina measc bheadh

- Bailiú, taifead agus coinneáil sonraí
- Bailiú, eagrú, stóráil, athrú nó leasú sonraí
- Ag inniúchadh, dul i gcomhairle le nó ag baint úsáide as na sonraí
- Sonraí a nochtadh tré iad a roinnt, a scaipeadh nó iad a chur ar fáil
- Sonraí a ailíniú, a mheascadh, a bhlocáil, a ghlanadh amach nó a scrío

Próiseálaí Sonraí: duine ar bith a dhéanann próiseáil ar eolas pearsanta thar cheann an rialathóir sonraí, seachas fostaí de chuid an rialathóir sonraí agus a dhéanann próiseáil ar a leithéid de sonraí mar chuid dá ndualgais fostaíochta, mar shampla, d'fhéadfadh gur fostaí de chomhlacht seachtarach a dhéanann próiseáil ar son an rialathóir sonraí. Leagann an reachtaíocht um Chosaint Sonraí freagracht ar chomhlachtaí dá leithéid i dtaca le próiseáil na sonraí sin. [m.sh. Aladdin, School Accounting etc]

Tagraíonn **Sonraí Pearsanta Íogaire** do Shonraí Pearsanta maidir leis an méid a leanas:

- Bunadh ciníoch nó eitneach
- Tuairimí polaitiúla nó creidimh reiligiúnacha nó fhealsúnacha
- Sláinte fhisiciúil nó meabhrach
- Saol gnéis agus gléaschlaonadh
- Sonraí géineolaíochta nó bithmhéadaracha
- Ciontuithe coiriúla nó cion a líomhnaíodh
- Ballraíocht de cheardchumann

Sárú ar Shonraí Pearsanta: sárú ar shlándáil ríomhaireachta a chúisigh scrios timpisteach nó neamhdhleathach, cailleadh, athrú, nochtadh neamhúdaraithe ar nó rochtain ar sonraí pearsanta stóráilte nó próiseáilte. Ciallaíonn sé seo comhghéilleadh nó cailleadh sonraí pearsanta cuma conas nó cá dtarlaíonn sé.

REÁSÚNAÍOCHT

Anuas ar a ndualgais dhlíthiúla faoi shainchúram fairsing na reachtaíochta oideachais, tá freagracht dhlíthiúil ar an scoil chun na hAchtanna um Chosaint Sonraí 1988 go 2018 agus RGCS a chomhlíonadh.

Mínítear sa pholasáí seo cén sórt sonraí a bhailítear, cén fáth a mbailítear iad, cé chomh fada a stórálfar iad agus cé leis a roinnfear iad. Caitheann an scoil lena gcuid freagrachtaí faoin dlí um Chosaint Sonraí go han-tromchúiseach, agus is mian leo cleachtais shábháilte a chur i bhfeidhm chun sonraí pearsanta duine a chosaint. Aithnítear, chomh maith, go n-éascaíonn faisnéis fhíriciúil a chur i dtaifead go cruinn agus í a stóráil go sábháilte measúnú a dhéanamh ar an bhfaisnéis agus a chur ar chumas an phríomhoide agus an bhoird bhainistíochta chun cinntí a dhéanamh maidir le reáchtáil éifeachtúil na Scoile. Anuas air sin, baineann rithábhacht le láimhseáil éifeachtúil na sonraí lena chinntiú go bhfuil comhsheasmhacht agus leanúnachas ann sa chás go dtagann athrú ar an bpearsanna laistigh den scoil agus den bhord bainistíochta

Data: What is meant by data is information in a form that can be processed. 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.

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. [e.g. Aladdin, School Accounting etc.]

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 alleged 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.

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 individuals' 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.

DUALGAIS DHLITHIÚIL EILE

Cuirtear san áireamh i gcur i bhfeidhm an pholasaithe seo dualgais agus freagrachtaí eile dlíthiúla na scoile. Baineann cuid díobh seo go díreach le cosaint sonraí. **Mar shampla:**

- Faoi Alt 9(g) den Acht Oideachais, 1998, ní mór rochtain a thabhairt do thuismitheoirí dalta, nó do dhalta a bhain aois 18 mbliana amach, ar thaifid a choimeádann an scoil a bhaineann le dul chun cinn an dalta ina n-oideachas.
- Faoi Alt 20 den Acht Oideachais (Leas), 2000, ní mór don scoil clár a choimeád de gach dalta a fhreastalaíonn ar an scoil.
- Faoi Alt 20(5) den Acht Oideachais (Leasú), 2000, tá dualgas ar phríomhoide chun faisnéis áirithe a chur in iúl a bhaineann le freastal linbh ar an scoil agus ceisteanna eile a bhaineann le dul chun cinn oideachais an linbh do phríomhoide scoile eile a bhfuil an leanbh ag aistriú chuici. Seolfaidh Gaelscoil Lir cóip de Pas Oideachais an pháiste, deartha ag an NCCA, ag príomhoide na meánscoile ina bheidh an dalta cláraithe. Sa chás go bhfuil tuairiscí ar dhaltaí a scríobh daoine gairmiúla eile seachas foireann Ghaelscoil Lir ag an scoil i bhfilteáin daltaí reatha, ní ceadmhach a leithéid de thuairisc a sheoladh ar aghaidh ag an Iar-Bhunscoil gan cead soiléir i scríbhinn a iarraidh agus a fháil ó thuismitheoirí agus caomhnóirí na ndaltaí ábhartha sin.
- Faoi Alt 21 den Education (Welfare) Act, 2000, ní mór don scoil freastal nó neamhfheastal daltaí atá cláraithe ag an scoil ar gach lá scoile a chur i dtaifead.
- Faoi Alt 28 den Acht Oideachais (Leasú), 2000, féadfaidh an Scoil Sonraí Pearsanta a choimeádann siad a sholáthar do chomhlachtaí áirithe forordaithe (an Roinn Oideachais, TÚSLA, an Chomhairle Náisiúnta um Oideachas Speisialta agus scoileanna eile) Caithfidh an BB a bheith sásta go n-úsáidfead iad do “chuspóir ábhartha” (lena n-áirítear stair oideachais nó oiliúna duine a chur i dtaifead nó chun monatóireacht a dhéanamh ar a ndul chun cinn oideachais nó oiliúna; nó chun tabhairt faoi thaighde ar scrúduithe, páirt a ghlacadh in oideachas agus in éifeachtacht ghinearálta oideachais nó oiliúna).
- Faoi Alt 14 den Acht um Oideachas do Dhaoine a bhfuil Riachtanais Speisialta Oideachais acu, 2004, ceanglaítear ar an scoil chun an fhaisnéis sin a iarraidh an Chomhairle go réasúnta ó thráth go chéile a sholáthar don Chomhairle Náisiúnta um Oideachas Speisialta (agus dá bhfostaithe, lena n-áireofaí Eagraithe Riachtanais Speisialta Oideachais).
- Foráiltear san Acht um Shaoráil Faisnéise, 1997, ceart cáilithe chun rochtain a fháil ar fhaisnéis atá á coimeád ag comhlachtaí poiblí nach riachtanach gur “sonraí pearsanta” atá i gceist leo i gcomhréir leis an reachtaíocht um chosaint sonraí. Cé nach bhfuil formhór na scoileanna faoi réir na reachtaíochta um shaoráil faisnéise faoi láthair, má sholáthair scoil faisnéis do chomhlacht atá cumhdaithe ag an Acht um Shaoráil Faisnéise (ar nós na Roinne Oideachais agus Scileanna etc.), d’fhéadfaí na taifid seo a nochtadh má dhéantar iarratas ar an gcomhlacht sin.
- Faoi Alt 26(4) den Acht Sláinte, 1947, cuirfidh Scoil faoi deara go dtugtar gach áis réasúnta (áiseanna chun ainmneacha agus seoltaí dalta a fhreastalaíonn ar an scoil san áireamh) d’údarás sláinte a sheirbheáil fógra orthu i leith cigireacht leighis, e.g. cigireacht fioclóireachta.
- Faoi Acht um Thús Áite do Leanaí 2015: tá freagrachtaí ar na daoine faoi shainordú atá sa scoil mí-úsáid nó faillí leanaí a thuairisciú do TÚSLA – an Ghníomhaireacht um Leanaí agus an Teachglach (nó i gcás éigeandála agus nach bhfuil fáil ar TÚSLA, an Garda Síochána).

OTHER LEGAL OBLIGATIONS

Implementation of this policy takes account of the school’s other legal obligations & 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 Section 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 Lir will send by post a copy of a child’s Educational Passport, as provided by the NCCA, to the principal of the Post-Primary School in which the pupil will be enrolled. Where reports on pupils which have been completed by professionals, apart from Gaelscoil Lir 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 and guardians of 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 1997 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, 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 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 a medical inspection e.g. a dental inspection.
- Under Children First Act 2015, mandated persons in school 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).

GAOL le SPIORAD SAINIÚIL na SCOILE

Cuireann Gaelscoil Lir gaeleoidéachas páiste-lárnach den scoth ar fáil do gach páiste scoile. Cuirtear béim sa scoil ar thimpeallacht sábháilte, cairdiúil, spreagúil agus sona a chruthú ionas gur féidir le páistí forbairt ar bhonn iomlánaíoch ag tógáil na gnéithe acadúla, fisiceacha agus meabhairshláinte san áireamh. Tá béim faoi leith ar mheas a léiriú inár scoil; meas orainn féin, meas ar dhaoine eile agus meas ar an timpeallacht.

Tá de chuspóir againn na spriocanna seo a bhaint amach agus meas á léiriú ar phríobháideacht agus ar chearta um chosaint sonraí daltaí, na foirne, tuismitheoirí/caomhnóirí agus daoine eile a idirghníomhaíonn linn. Is mian leis an scoil na haidhmeanna/misin seo a bhaint amach & meas iomlán á léiriú ar chearta daoine i leith príobháideachta & cearta faoin Reachtaíocht um Chosaint Sonraí.

SONRAÍ PEARSANTA

I measc na dtaifead ar Shonraí Pearsanta atá á gcoimeád ag an scoil, d'fhéadfadh an méid a leanas a bheith i gceist:

1. TAIFID FOIRNE:

a. **CATAGÓIRÍ** sonraí foirne: Mar aon leis na comhaltaí reatha foirne (agus iarchomhaltaí foirne), d'fhéadfadh go mbainfeadh na taifid seo le hiarratasóirí a dhéanann iarratas ar phoist laistigh den scoil, múinteoirí faoi oiliúint agus múinteoirí faoi phromhadh. D'fhéadfaí a áireamh leis na taifid foirne seo:

- Ainm, seoladh & sonraí teagmhála, uimhir PSP
- Buntaifid iarratais agus cheapacháin (foirmeacha iarratais, scéimeanna marcála agallaimh agus cáipéisí eile a bhaineann le hearcú agus le roghnú, ar nós teistiméireachtaí, torthaí Ghrinnfhiosrúchán an Gharda Síochána agus measúnuithe Medmark)
- Taifead ar cheapacháin le poist ardú céime
- Sonraí faoi asláithreacht fhaofa (sosanna gairme, saoire thuismitheora, saoire staidéir etc.)
- Sonraí faoin taifead oibre (cáilíochtaí, na ranganna a múineadh, na hábhair etc.)
- Sonraí faoi ghearáin agus/nó chasaoid, lena n-áirítear comhairliúcháin nó plé inniúlachta, pleananna gníomhaíochta/ feabhsaithe/measúnachta agus taifead ar dhul chun cinn
- Sonraí faoi aon timpistí/ghortuithe a tharla ar réadmhaoin na scoile nó i dtaca leis an gcomhalta foirne a thugann faoina ndualgais scoile
- Taifid ar aon tuairiscí a rinne an scoil (nó a bhfostaithe) maidir leis an gcomhalta foirne maidir leis an gcomhalta foirne do ranna Stáit agus/ó do ghníomhaireachtaí eile faoin Acht um Thús Áite do Leanáí 2015

b. **CUSPÓIRÍ:** Coimeádtar taifid foirne do na cuspóirí a leanas:

- bainistíocht agus riarachán ghnó na scoile (anois agus amach anseo)
- íocaíocht na foirne a éascú, agus chun sochair/teidlíochtaí eile a ríomh (lena n-áirítear seirbhís ináirithe chun íocaíochtaí pinsin, teidlíochtaí agus/nó íocaíochtaí iomarcaíochta a ríomh sa chás gur cuí)
- íocaíochtaí pinsin a éascú amach anseo
- bainistíocht acmhainní daonna.
- arduithe céime a rinneadh a chur i dtáifead (cáipéisíocht a bhaineann le hardú céime ar a ndearnadh iarratas) agus athruithe a tháinig ar fhreagrachtaí etc.
- a chur ar chumas na scoile chun a gcuid dualgas a chomhlíonadh mar fhostóir, lena n-áirítear timpeallacht shábháilte éifeachtúil oibre agus múinteoireachta a chaomhnú (lena n-áirítear a gcuid freagrachtaí faoin Acht um Shábháilte, Sláinte agus Leas ag an Obair, 2005) a chomhlíonadh
- a chur ar chumas na scoile chun na ceanglais a leagann an Roinn Oideachais agus Scileanna, na Coimisinéirí Ioncaim, an Chomhairle Náisiúnta um Oideachas Speisialta, TÚSLA, FSS, agus aon ranna agus/nó gníomhaireachtaí rialtais, reachtúla agus/nó rialála síos a chomhlíonadh
- an reachtaíocht a bhaineann leis an scoil a chomhlíonadh.

RELATIONSHIP to the CHARACTERISTIC SPIRIT of the SCHOOL

Gaelscoil Lir provides excellent child-centered, Irish-Medium education for all children. An emphasis is placed on creating a safe, friendly, inspiring and content environment to allow children to develop holistically, prioritising academic development as well as physical literacy and mental wellbeing. There is a particular emphasis on showing respect in our school; respect for ourselves, for others and for the environment.

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' right to privacy and rights under the Data Protection Legislation.

PERSONAL DATA

The Personal Data records held by the school may include:

1. STAFF RECORDS:

a. **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 & contact details, PPS no.
- Original records of application and appointment (including application forms, interview marking schemes and other documents relating to recruitment and selection such as references, Garda vetting outcomes and Medmark assessments)
- Record of appointments 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 complaints and/or grievances, including consultations or competency discussions, action, improvement, evaluation plans and record of progress
- 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.

b. **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 resource 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, TÚSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies
- and for compliance with legislation relevant to the school.

c. LÁTHAIR & SLÁNDÁIL

- Coimeádtar taifid de láimh go slán, sábháilte faoi ghlas i gcómhadchaibinéid agus gan teacht orthu ach ag fostaithe atá údaraithe leis na sonraí sin a úsáid. Ní mór do na fostaithe sin na sonraí sin a choinneáil faoi rún.
- Coimeádtar taifead digiteach ar ríomhairí a bhfuil cosaint phasfhocail agus bogearraí balla dóiteáin orthu. Bíonn Córas Rogha Aláram Ionraidh ar siúl lasmuigh d'uaireanta scoile.

2. TAIFID DHALTAÍ:

a. CATAGÓIRÍ sonraí daltaí: D'fhéadfaí a áireamh leo seo:

- Faisnéis a d'fhéadfaí a lorg agus a chur i dtaifead ar chláir agus a d'fhéadfaí a chur le chéile agus a bhailiú i gcaitheamh thréimhse an dalta sa scoil. D'fhéadfaí a áireamh leis na taifid seo:
- ainm, seoladh agus sonraí teagmhála, uimhir PSP
- dáta agus áit bhreithe
- ainmneacha agus seoltaí na dtuismitheoirí/na gcaomhnóirí agus a sonraí teagmhála (lena n-áirítear aon socrúithe speisialta maidir le caomhnóireacht, coimeád nó rochtain)
- creideamh reiligiúnach
- bunadh ciníoch nó eitneach
- ballraíocht de phobal an Lucht Siúil, sa chás gur cú
- cad í céad teanga an dalta agus cibé a labhraítear teangacha eile sa bhaile.
- aon choinníollacha ábhartha speisialta (e.g. riachtanais speisialta oideachais, saincheisteanna sláinte) a d'fhéadfadh bheith i gceist.
- Faisnéis ar an iarthaifead acadúil (lena n-áirítear tuairiscí, teistiméireachtaí, measúnuithe agus taifid eile ó aon scoil(eanna) ar ar fhreastail an dalta roimhe seo
- Measúnuithe síceolaíoch, síciatracha agus/nó leighis
- Taifid tinrimh
- Grianghraif & íomhánna taifeadta de dhaltaí (lena n-áirítear ag imeachtaí scoile agus éachtaí a chur i dtaifead) a bainistítear de réir polasáí grianghraifeadóireachta na scoile, leis seo.
- Taifead acadúil – ábhair ar a ndearnadh staidéar, tascanna ranga, torthaí scrúdaithe faoi mar atá siad taifeadta ar thuairiscí oifigiúla scoile
- Taifid ar éachtaí suntasacha
- Taifid ar shaincheisteanna/imscrúduithe disciplíneacha agus/nó na smachtbhannaí a ghearrtar
- Taifid eile, e.g. taifid ar aon ghortuithe/timpistí tromchúiseacha etc. (Nóta: moltar chun tuismitheoirí a chur ar an eolas go bhfuil teagmhas ar leith á chur i dtaifead)
- Taifid ar aon tuairiscí a rinne an scoil (nó a bhfostaithe) maidir leis an dalta le ranna Stáit agus/nó le gníomhaireachtaí eile faoin Acht Tús Áite do Leanáí 2015.

b. CUSPÓIRÍ: Coimeádtar taifid dalta do na cuspóirí a leanas:

- a chur ar chumas gach dalta a lánchumas a fhorbairt
- na ceanglais reachtaíochta nó riaracháin a chomhlíonadh
- a chinntiú gur féidir leis na daltaí incháilithe tairbhe a bhaint ón múinteoireacht ábhartha nó na tacaíochtaí airgeadais breise
- tacú le teagasc reiligiúnach a sholáthar
- a chur ar chumas teagmháil a dhéanamh le tuismitheoirí/ caomhnóirí i gcás éigeandála nó sa chás go ndúntar an scoil, nó chun tuismitheoirí a chur ar an eolas ar dhul chun cinn a linbh nó chun tuismitheoirí a chur ar an eolas ar imeachtaí Scoile etc.
- freastal ar riachtanais oideachais, shóisialta, fhisiciúla agus mhothúcháin an dalta
- glactar grianghraif agus íomhánna taifeadta de dhaltaí chun éachtaí scoile a cheiliúradh, bliainirísí a chur le chéile, láithreán gréasáin a bhunú, imeachtaí scoile a chur i dtaifead, agus chun taifead a choimeád ar stair na scoile. Glactar agus úsáidtear na taifid siúd i gcomhréir le Polasáí Úsáide Inghlactha atá á ndéanamh faoi láthair. a chinntiú go gcomhlíonann an dalta critéir iontrála na scoile
- a chinntiú go gcomhlíonann na daltaí na riachtanais aoise íosta do chláirúchán bunscoile.
- cáipéisíocht/faisnéis a sholáthar faoin dalta don Roinn Oideachais agus Scileanna, an Chomhairle Náisiúnta um Oideachas Speisialta, TÚSLA, agus scoileanna eile etc. i gcomhlíonadh an dlí agus na dtreoracha a eisiúint ranna rialtais.

c. LOCATION & SECURITY

- Manual records are kept in a secure, locked filing cabinet 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.
- Digital records are stored on password-protected computers with firewall software. The school has the intruder alarm activated during out-of-school hours.

2. STUDENT RECORDS:

a. CATEGORIES of student data 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 & 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
- what the child's first language is and whether or not other languages are spoken in the home
- any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply.
- Information on previous academic record (include. 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
- 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.

b. 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 case of emergency or in the case of school closure, or to inform parents of their child's educational progress, or to inform parents of School events, etc.
- to meet the educational, social, physical and emotional requirements of the student
- photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school. Such records are taken and used in accordance with the school's acceptable usage policy currently being drafted.
- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirements for attendance at Primary School.
- to furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TÚSLA, and other schools, etc. in compliance with law and directions issued by governmental departments.

- cáipéisíocht/faisnéis/teistiméireachtaí a sholáthar d'institiúidí dara leibhéal oideachais a iarrann an dalta (nó a dtuismitheoirí/a gcaomhnóirí i gcás dalta faoi 18 mbliana d'aois).

c. LÁTHAIR & SLÁNDÁIL

- Coimeádtar taifid de láimh go slán, sábháilte faoi ghlas i gcómhadchaibinéid in oifig riaracháin glasáilte agus gan teacht orthu ach ag fostaithe atá údaraithe leis na sonraí sin a úsáid. Ní mór do na fostaithe sin na sonraí sin a choinneáil faoi rún.
- Coimeádtar taifead digiteach ar ríomhairí a bhfuil cosaint phasfhocail agus bogearraí balla dóiteáin orthu. Bíonn Córas Rogha Aláram Ionraidh ar siúl lasmuigh d'uaireanta scoile.

3. TAIFID an BHOIRD BHAINISTÍOCHTA:

- a. **CATAGÓIRÍ** de shonraí an bhoird bainistíochta: D'fhéadfaí a áireamh leo seo:
- Ainm, seoladh agus sonraí teagmhála gach comhalta den bhoird bainistíochta (agus iarchomhaltaí an BB)
 - Taifid maidir le ceapacháin a dhéantar leis an mBord
 - Miontuairiscí ar chruinnithe an Bhoird Bhainistíochta agus an chomhfhreagrais a sheoltar chuig an mBord, ina bhféadfadh tagairtí do dhaoine ar leith a bheith i gceist.
 - 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
- b. **CUSPÓIRÍ:** A chur ar chumas an Bhoird Bhainistíochta chun oibriú i gcomhréir leis an Acht Oideachais, 1998 agus leis an reachtaíocht infheidhme eile agus le taifead a choimeád ar choinní agus cinntí an bhoird.
- c. **LÁTHAIR & SLÁNDÁIL** Mar atá thuas

4. **TAIFID EILE** Coimeádfaidh Gaelscoil Lir taifid eile a bhaineann le daoine. Taifead de láimh a bheidh san fhormaid ina gcoimeádtar na taifid seo (comhad pearsanta laistigh de chomhad ábhartha comhdaithe) agus/ nó taifead ríomhaire (bunachar sonraí). Leagtar amach thíos roinnt samplaí de shaghas na dtaifead eile a choimeádtar an scoil (ní liosta críochnaitheach an liosta seo):

CREIDIÚNAITHE

- a. **CATAGÓIRÍ** sonraí: féadfaidh an scoil roinnt den fhaisnéis a leanas nó an fhaisnéis go léir a leanas a choimeád faoi chreidiúnaithe (ar daoine féinfhostaithe roinnt díobh):
- ainm
 - seoladh
 - sonraí teagmhála
 - uimhir PSP
 - sonraí cánach
 - sonraí bainc agus
 - an méid a íocadh leo.
- b. **CUSPÓIRÍ:** Teastaíonn an fhaisnéis chun gnáthbhainistiú agus gnáthriaradh a dhéanamh ar ghnóthaí airgeadais na scoile, lena n-áirítear sonraisc a íoc, cuntais bhliantúla airgeadais a chur le chéile agus iniúchtaí agus imscrúduithe a dhéanann na Coimisinéirí Ioncaim a chomhlíonadh.
- c. **LÁTHAIR & SLÁNDÁIL:** I gcaibinéad slán faoi ghlas in oifig an príomhoide/oifig an Rúnaí

- 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

c. LOCATION & SECURITY

- 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.
- Digital records are stored on password-protected computers with firewall software. The school has the intruder alarm activated during out-of-school hours.

3. BOARD of MANAGEMENT RECORDS:

- a. **CATEGORIES** of board of management data: These may include:
- Name, address and contact details of each member of the board of management (including former members of the BoM)
 - 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.
 - 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
- b. **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
- c. **LOCATION & SECURITY** As above
4. **OTHER RECORDS** Gaelscoil Lir will hold other records relating to individuals. The format in which these records will be kept are manual record (personal file within a relevant filing system), computer record (database). Some examples of the type of other records which the school will hold are set out below (this list is not exhaustive):

CREDITORS

- a. **CATEGORIES** of data: the school may hold some or all of the following information about creditors (some of whom are self-employed individuals):
- name
 - address
 - contact details
 - PPS number
 - tax details
 - bank details and
 - amount paid
- b. **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
- c. **LOCATION & SECURITY :** In a secure filing cabinet in the principal's / secretary's office.

FOIRMEACHA AISÍOCAÍOCHT CÁNACH ar CHARTANACHT

- a. **CATAGÓIRÍ** sonraí: féadfaidh an scoil na sonraí a leanas a choimeád maidir le deontóirí a rinne tabhartais charthanúla leis an scoil:
- ainm
 - seoladh
 - uimhir ghutháin
 - uimhir PSP
 - ráta cánach
 - síniú agus
 - ollmhéid an tabhartais
- b. **CUSPÓIRÍ:** Tá scoileanna i dteideal fáil a bheith acu ar an scéim faoiseamh cánach do thabhartais airgid a fhaigheann siad. Chun an faoiseamh a éileamh, ní mór don deontóir deimhniú (CHY2) a chomhlánú agus é a thabhairt don scoil chun ligean dóibh ollsuiam na cánach a bhaineann leis an tabhartas a éileamh. Ar an bhfaisnéis a iarrtar ar an deimhniú cuir tá ainm, seoladh, uimhir PSP, ráta cánach, uimhir ghutháin, síniú an tuismitheora agus ollmhéid an tabhartais. Coimeádann an Scoil seo i gcás go ndéanann na Coimisinéirí Ioncaim iniúchadh.
- c. **LÁTHAIR & SLÁNDÁIL:** Coinítear na foirmeacha seo i gcaibinéad slán faoi ghlas in oifig an phríomhoide

TORTHAÍ MEASÚNAITHE/SCRÚDAITHE

- a. **CATAGÓIRÍ:** Coimeádfaidh an scoil sonraí ina bhfuil torthaí scrúdaithe maidir lena ndaltaí go léir. Ina measc seo beidh, torthaí scrúdaithe ranga agus torthaí Scrúduithe Chaighdeánaithe.
- b. **CUSPÓIRÍ:** Is é an príomhchuspóir a choimeádtar na torthaí scrúdaithe seo ná chun monatóireacht a dhéanamh ar dhul chun cinn dalta agus chun bonn daingean a sholáthar maidir leibhéal gnóthachtála oideachais agus moltaí don todhchaí. Féadtar na sonraí seo a bhailiú ar mhaithe le cuspóirí staitistiúla/tuairiscithe, ar nós táblaí torthaí a bhailiú. Féadtar na sonraí seo a aistriú chuig an Roinn Oideachais agus Scileanna, an Chomhairle Náisiúnta Curaclaim agus Measúnachta agus na comhlachtaí siúd comhchosúla eile.
- c. **LÁTHAIR & SLÁNDÁIL:** Sábháiltear torthaí na Scrúdaithe Chaighdeánaithe go digiteach ar chóras bunachair Aladdin. Coimeádtar cóipchrua de na torthaí i gcaibinéad slán faoi ghlas in oifig an phríomhoide. Coimeádann na múinteoirí torthaí na scrúdaithe ranga sna seomraí ranga. Coimeádtar taifid de láimh go slán, sábháilte faoi ghlas i gcómhadchaibinéid sa seomra. Coimeádtar taifid digiteach ar an bhfreastalaí scoile le ríomhairí a bhfuil cosaint phasfhocail, bogearraí balla dóiteáin orthu.

TEASTAIS BREITHE

- a. **CATAGÓIRÍ:** Coimeádann an scoil cóip de na teastais seo a leanas • Teastas Breithe
- b. **CUSPÓIRÍ:** Is é an príomhchuspóir a choimeádtar na teastais seo ná
- a chinntiú go gcomhlíonann na daltaí na riachtanais aoise íosta do chlárúchán bunskoile.
 - teacht a bheith ag an scoil ar shonraí beacht, cruinn le bunachar POD á líonadh.
- c. **LÁTHAIR & SLÁNDÁIL:** Coimeádtar cóip chrua de na teastais go slán, sábháilte faoi ghlas i gcomhadchaibinéid san oifig riaracháin. Scriostar na Teastais Breithe nuair a thosaíonn na daltaí ar scoil agus nuair a bhíonn an bunachar POD líonta.

NASC LE POLASAITHE EILE & LE SOLÁTHAR CURACLAIM

Is gá do pholasaithe scoile a bheith comhsheasmhach lena chéile, laistigh de chreatlach Phlean foriomlán na Scoile. Ba cheart scrúdú a dhéanamh ar na polasaithe ábhartha atá i bhfeidhm cheana féin nó atá á bhforbairt nó á n-athbhreithniú, agus tagairt á déanamh don Pholasáí um Chosaint Sonraí agus ba cheart dul i ngleic le haon impleachtaí a mbíonn aige dóibh.

CHARITY TAX-BACK FORMS

- a. **CATEGORIES** of data: the school may hold the following data in relation to donors who have made charitable donations to the School:
- name
 - address
 - telephone number
 - PPS number
 - tax rate
 - signature and
 - the gross amount of the donation.
- b. **PURPOSES:** Schools are entitled to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY2) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation. The information requested on the appropriate certificate is the parents' name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the school in the case of audit by the Revenue Commissioners
- c. **LOCATION & SECURITY:** These forms are kept in a secure, locked cabinet in the principal's office

ASSESSMENT/EXAMINATION RESULTS

- a. **CATEGORIES:** The School will hold data comprising examination results in respect of its students. These include class test results and the results of Standardised Tests.
- b. **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 guardians about educational attainment levels and recommendations for the future. The data will also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and such other school to which the pupils move.
- c. **LOCATION & SECURITY:** Standardised test results are saved digitally on the Aladdin database. Hardcopies of the results as kept in a secure cabinet in the principal's office. Class examination results are kept by the teachers in their classrooms. Manual records are kept in a secure, locked filing cabinet in the classroom. Digital records are stored on the school server via password-protected laptops and with adequate firewall software.

BIRTH CERTIFICATES

- a. **CATEGORIES:** The School will hold a copy of the following certificates:
- Birth Certificate
- b. **PURPOSES:** The main purpose for which these certificates are held is
- to ensure that the student meets the school's admission criteria
 - to have access to specific information that is required to populate the POD database.
- c. **LOCATION & SECURITY:** These certificates are held in manual form and are kept in a secure, locked cabinet in the administration office. The Birth Certificates are destroyed once the children have started school and the POD database has been populated.

LINKS TO OTHER POLICIES & 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.

D'fhéadfadh na beartais a leanas a bheith i measc na mbeartas ar a ndéantar breithniú:

- Bunachar Sonraí Daltaí Ar-Líne (POD): bailiú sonraí leis na dualgais a bhaineann le bunachar sonraí daltaí ar-líne na ROS a chomhlíonadh.
- Polasaí um Chosaint Leanaí
- Polasaí Frithbhulaíochta
- Cód Iompair
- Polasaí Clárúcháin
- Polasaí um Úsáid Inghlactha TFC.
- Polasaí Measúnaithe
- Polasaí um Oideachas Speisialta
- Polasaí Scéim Iasachta Téacsleabhair
- Polasaí Teagmhas Criticiúil
- Polasaí Tinrimh

PRÓISEÁIL DE RÉIR CEARTA AN ÁBHAR SONRAÍ

I nGaelscoil Lir déanfar gach taifead ar shonraí pearsanta a phróiseáil i gcomhréir le cearta an ábhar sonraí. Tá an ceart ag an duine is ábhar do na sonraí:

- Fios a bheith aige/aici cén sonraí pearsanta atá á choimeád ag an scoil air/uirthi.
- Iarratas a dhéanamh rochtain a fháil ar aon sonraí atá á choimeád ag ar an rialathóir sonraí air/uirthi
- Próiseáil a chuid/cuid sonraí ar son margaíocht dhíreach a chosc
- Iarraidh go gceartófar a sonraí má tá siad míchruinn.
- Iarraidh go scríosfar a sonraí chomh luath is nach bhfuil sé ag teastáil nó neamhábharach

Sárú ar Shonraí Pearsanta

- Is gá aon eachtra sárú ar shonraí pearsanta a thuairisciú d'Oifig an Choimisinéara Chosaint Sonraí laistigh de 72 uair a chloig.
- Má tá an riosca ard ann go mbeidh cearta agus saoirsí an duine nádúrtha i mbaol de bharr na sáráithe sin, is gá do BB an ábhar sonraí a chur ar an eolas faoin sárú pearsanta sonraí sin, gan mhoill.
- Má bhíonn próiseálach sonraí feasach ar shárú ar shonraí pearsanta, is gá dó é seo a chur in iúl don rialathóir sonraí (BB) gan mhoill.

Deighleáil le hiarratas ar rochtain ar shonraí

- Tá duine ar bith i dteideal cóip a lorg de na sonraí pearsanta a coimeádtar faoi/fúithi, ar iarratas i scríbhinn.
- Is gá freagairt don iarratas sin laistigh de mhí amháin. D'fhéadfadh sé go mbeadh gá le síneadh ama m.sh. thar tréimhsí saoire
- Ní ghearrfar táille rochtana ach i gcásanna eisceachtúla sa chás go mbíonn na hiarratais athráiteach, gan bhunús nó iomarcach.
- Ní chuirfear sonraí pearsanta a bhaineann le duine aonair ar bith eile seachas an ábhar sonraí ar fail.

EOLAS A CHUR AR FÁIL AR AN NGUTHÁN

Is gá d'fhostaithe a bhíonn ag deighleáil le fiosrúcháin ar an nguthán a bheith cúramach faoi eolas pearsanta ata ag an scoil a nochtadh ar an nguthán. Is ceart don fostaí:

- Iarraidh ar an nglaoiteoir an t-iarratas a chur i scríbhinn
- Iarratais casta a chur ar aghaidh ag an bpríomhoide
- Gan mothú faoi fhiacha eolas pearsanta a nochtadh

SOCRAITHE, RÓIL & FREAGRACHTAÍ maidir le CUR i bhFEIDHM

Is é an BB an rialathóir sonraí agus is é an Príomhoide a chuireann an Polasaí um Chosaint Sonraí i bhfeidhm ag cinntiú go bhfuil cur amach ag an bhfoireann a láimhseálann nó a mbíonn rochtain acu ar Shonraí Pearsanta ar a gcuid freagrachtaí um chosaint sonraí.

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
 - Book-Rental Policy
 - Critical Incident Policy
 - Attendance Policy

PROCESSING IN LINE WITH A DATA SUBJECT'S RIGHTS

Data in Gaelscoil Lir 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.

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.
- 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

IMPLEMENTATION ARRANGEMENTS, 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.

Is iad na daoine seo a leanas atá freagracht as gach gníomh a chur i bhfeidhm:

Rialathóir Sonraí

Bord Bainistíochta Ghaelscoil Lir

Cur i bhFeidhm an Pholasaí

Príomhoide: Sinéad Bheilbigh

FAOMHADH & CUMARSÁID

Faomhadh ag cruinniú BB ar an xxxx agus sínithe ag an gCathaoirleach. Taifead den faomhadh déanta ag an Rúnaí i Miontuairiscí an chruinnithe. Polasaí um Chosaint Sonraí curtha suas ar shuíomh ghréasáin na scoile agus tuimitheoirí curtha ar an eolas faoi i nuachtlitr na scoile ar xxxx.

MONATÓIREACHT a DHÉANAMH ar CHUR I bhFEIDHM an PHOLASAÍ

Déanfaidh an Príomhoide, an fhoireann agus an Bord Bainistíochta monatóireacht ar chur i bhfeidhm an Pholasaí um Chosaint Sonraí.

ATHBHREITHNIÚ & MEASÚNÚ AN PHOLASAÍ

Déanfar athbhreithniú agus measúnú ar an bpolasaí i ndiaidh bliana. Ba cheart go dtabharfar aird ar fhaisnéis nó treoirínte athraitheacha (e.g. ón gCoimisinéir Cosanta Sonraí, an Roinn Oideachais & Scileanna nó ó TÚSLA), reachtaíocht & aiseolas ó thuistí/chaomhnóirí, daltaí, foireann na scoile agus daoine eile nuair a bhíonn athbhreithniú agus measúnú leanúnach á dhéanamh. Déanfar an polasaí a leasú de réir mar is gá i gcomhthéacs an athbhreithnithe agus an mheasúnaithe sin agus laistigh de chreatlach phleanála na scoile.

Faomhadh thar cheann an Bord Bainistíochta

Ratified for & behalf of Board of Management

Cormac Mc Cashin Cathaoirleach

Dáta: 10/08/2021

THE FOLLOWING PERSONNEL HAVE RESPONSIBILITY FOR IMPLEMENTING THE DATA PROTECTION POLICY:

Data Controller

BoM Gaelscoil Lir

IMPLEMENTATION OF POLICY

Principal: Sinéad Bheilbigh

RATIFICATION & COMMUNICATION

Ratified at the BoM meeting on TBC and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting. School's Data Protection Policy uploaded on to school website and parents informed of same in the school's newsletter dated xxxx

MONITORING THE IMPLEMENTATION OF THE POLICY

The implementation of the Data Protection Policy shall be monitored by the Principal, staff and the Board of Management.

REVIEWING AND EVALUATING THE POLICY

The policy will be reviewed and evaluated after 1 year. 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 a review and evaluation and within the framework of school planning.

AGUISÍN 1 SCEIDEAL COINNEÁLA TAIFID DO SCOILEANNA

<p>Taifid a bhaineann le DALTAÍ:</p> <p>Clárleabhair/Leabhair Rollaí Foirmeacha Clárúcháin Nótaí Smachta Torthaí Scrúdaithe Chaighdeánaithe Measúnuithe Siceolaíochta Filteáin Riachtanais Oideachas Speisialta (SEN) /Pleananna Oideachais Aonair (IEP's) Tuairiscí Timpiste Tuairiscí/Taifid um Chosaint Leanaí Achomhairc Rannán 29 (S.29 Appeals)</p>	<p>Tréimhse Coinneála</p> <p>Gan Chríoch Coinnigh go mbíonn an dalta 25 bliana d'aois Coinnigh - Ná Scrios Riamh Coinnigh go mbíonn an dalta 25 bliana d'aois Coinnigh - Ná Scrios Riamh Coinnigh - Ná Scrios Riamh Coinnigh - Ná Scrios Riamh Coinnigh - Ná Scrios Riamh Coinnigh - Ná Scrios Riamh</p>
<p>Boird Agallaimh</p> <p>Scéim Marcála Nótaí an Bhoird Agallaimh (iarratasóirí nár éirí leo) Iarratais/Curriculum Vitea (CV's) (Iarratasóirí a glaoghtar chun agallaimh)</p>	<p>Tréimhse Coinneála</p> <p>18 mí i ndiaidh na hagallaimh + 6 mhí ar fhaitíos gur gá don Binse Achomhairc um Chomhionannas a chur in iúl don scoil go bhfuil éileamh á dhéanamh (2 bhliain)</p>
<p>Taifid Foirne</p> <p>Conradh Fostaíochta Clárú an Chomhairle Múinteoireachta Taifid Ghrinnfhiosrúcháin an Gharda Síochána Tuairisc Timpiste/Gortú ag an Obair</p>	<p>Tréimhsí Coinneála</p> <p>Coinnigh ar feadh tréimhse na fostaíochta + 7 mbliana Coinnigh ar feadh tréimhse na fostaíochta + 7 mbliana Coinnigh ar feadh tréimhse na fostaíochta + 7 mbliana 6 bliana le héileamh a dhéanamh in aghaidh na scoile agus bliain 1 le himeachtaí dlí a sheirbheáil ar an scoil</p>
<p>Taifid an Bhoird Bhainistíochta</p> <p>Clár & Miontuairiscí Cruinnithe Boird Páigh Rolla & Cúrsaí Cánach Sonraisc/Admhálacha Cuntais Iniúchta</p>	<p>Tréimhsí Coinneála</p> <p>Gan Chríoch Éillíonn Oifig na gCoimisinéirí Ioncaim tréimhe 6 bliana i ndiaidh deireadh na bliana cánach Coinnigh ar feadh 7 mbliana Gan Chríoch</p>

Cén fáth go molann an Coimisiún um Chosaint Sonraí go gcoinnítear taifid ar leith go mbíonn an iar-dhalta 25 bliana d'aois?

Sé'n chúis atá leis seo ná go sroicheann an dalta lán-aois agus gur cheart go mbeadh tréimhse teorann 6 bliana ann ina dhiaidh sin gur féidir leo éileamh a dhéanamh in aghaidh scoil maraon le bliain 1 eile le himeachtaí dlí a sheirbheáil ar an scoil. Leagann Reachtaíocht na dTréimhsí síos teorainn ama ar an gceart gníomhaíochta rud a chiallaíonn nach féidir cás a ghlacadh i ndiaidh an ama sin.

APPENDIX 1 DATA RETENTION PERIOD FOR SCHOOLS

Pupil Related	Retention Periods
School Register/Roll Books Enrolment Forms Disciplinary notes Test Results – Standardised Psychological Assessments etc. SEN Files/IEPS Accident Reports Child Protection Reports/Records S.29 Appeals	Indefinitely Hold until Pupil is 25 Years Never Destroy Hold until pupil is 25 Years Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy
Interview Records	Retention Periods
Interview Board Marking Scheme Board of Management notes (for unsuccessful candidates) Applications/Curriculum Vitae's (CV's) (for candidates who were called to interview)	18 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is being taken (2 years)
Staff Records	Retention Periods
Contract of Employment Teaching Council Registration Vetting Records Accident/Injury at work Reports	Retention for duration of employment + 7 years Retention for duration of employment + 7 years Retention for duration of employment + 7 years 6 years to make a claim against the school plus 1 year for proceedings to be served on school
BoM Records	Retention Periods
BOM Agenda and Minutes Payroll & Taxation Invoices/receipts Audited Accounts	Indefinitely Revenue require a 6-year period after the end of the tax year Retain for 7 Years Indefinitely

Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?

The reasoning is that a pupil reaches the age of majority at 18 years and that there should be a 6-year limitation period in which it would be possible to take a claim against a school, plus 1 year for proceedings to be served on a school. The Statute of Limitations imposes a limit on a right of action so that after a prescribed period any action can be time barred.