



DATA PROTECTION POLICY - MAY 2018

INTRODUCTORY STATEMENT

The school's Data Protection Policy applies to the personal data held by the school which is protected by the EU General Data Protection Regulation 2016/679 ("GDPR") enacted in legislation in Ireland under the Data Protection Bill Ireland 2018 and under other data protection legislation.

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, third parties, contractors, vendors 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 Category Personal Data* (formerly described as "sensitive personal data") will be protected by the school.

DATA PROTECTION PRINCIPLES

The school 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 school is obliged to comply with the principles of data protection set out in the EU General Data Protection Regulation 2016/679 which can be summarised as follows:

- **Obtain and process Personal Data lawfully, fairly and in a transparent manner:** 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, third parties, vendors, contractors 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 GDPR and the terms of this Data Protection Policy. The information will be obtained and processed lawfully, fairly and in a transparent manner.
- **Collect Personal Data for specified, explicit and legitimate purposes and process it only in ways compatible with that purpose:** The School will inform individuals of the reasons they collect their data and will inform individuals of the uses to which their data will be put. 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 controlled. All information is kept with the best interest of the individual in mind at all times.

- **Ensure that Personal Data is adequate, relevant and not excessive:** Only the necessary amount of information required to provide an adequate service will be gathered and stored.
- **Keep Personal Data accurate and, where necessary, 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 special category 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. The principal may delegate such updates/amendments to another member of staff. However, 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.
- **Retain Personal Data for 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 and Special Category 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.
- **Keep Personal Data safe and secure including protection against unauthorised or unlawful processing or accidental loss, destruction or damage using appropriate technical or organisational measures:** Only those with a genuine reason for doing so may gain access to the information. Special Category Personal Data is securely stored under lock and key in the case of manual records and protected with firewall software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) should be encrypted and password protected before they are removed from the school premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data.

In addition to the above principles, the GDPR provides that personal Data will not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. GDPR also recognises the enhanced rights of individuals for whom personal data is held which are outlined below.

SCOPE

Purpose of the Policy: The EU General Data Protection Regulation 2016/679 applies to the keeping and processing of Personal Data, both in manual and 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, third parties, contractors, vendors 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:

Data means information in a form that can be processed. It includes both *automated data* (e.g. electronic data) and *manual data*. Automated data means any information on computer, or information recorded with the intention that it be processed by computer. Manual data means information that is kept/recorded as part of a relevant filing system or with the intention that it forms part of a relevant filing system.

Relevant filing system means any set of information that, while not computerised, is structured by reference to individuals or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily, quickly and easily accessible.

Personal Data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller i.e. the school's Board of Management.

Data subject refers to the living natural person to whom the personal data relates

Special Category Personal Data refers to Personal Data regarding a person's:

- racial or ethnic origin, political opinions or religious or philosophical beliefs
- membership of a trade union
- physical or mental health or condition or sexual orientation
- genetic or biometric data for the purpose of uniquely identifying a living individual
- commission or alleged commission of any offence or
- any proceedings for an offence committed or alleged to have been committed by the person, the disposal of such proceedings or the sentence of any court in such proceedings, criminal convictions or the alleged commission of an offence.

Data Controller is the body who alone or jointly with others determines the purposes and means of the processing of personal data. For the purpose of this policy is the Board of Management, Clongowes Wood College SJ.

Data Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration,

retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Lawful basis for processing: Under Data Protection Law, there must be a lawful basis for all processing of personal data.

Personal data breach means 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.

RATIONAL

In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the EU General Data Protection Regulation 2016/679

This policy explains what sort of data is collected, why it is collected, how it will be stored and with whom it will be shared. As more and more data is generated electronically and as technological advances enable the easy distribution and retention of this data, the challenge of meeting the school's legal responsibilities has increased.

The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the principal and board of management to make decisions in respect of the efficient running of the School. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and board of management.

OTHER LEGAL OBLIGATIONS

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

For example:

- Under Section 9(g) of the Education Act, 1998, the parents of a student, or a student who has reached the age of 18 years, must be given access to records kept by the school relating to the progress of the student in their education
- Under Section 20 of the Education (Welfare) Act, 2000, the school must maintain a register of all students attending the School
- Under 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
- 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, the National Education Welfare Board, the National Council

for Special Education, other schools, other centres of education) provided the School is 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 in order to ascertain how best they may be assisted in availing of educational or training opportunities or in developing their educational potential; 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 (“SENOs”)) 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 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 medical inspection, e.g. a dental inspection
- Under *Children First: National Guidance for the Protection and Welfare of Children* (2017) published by the Department of Children & Youth Affairs, schools, their boards of management and their staff have responsibilities to report child abuse or neglect to TUSLA - Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

RELATIONSHIP TO CHARACTERISTIC SPIRIT OF THE SCHOOL (SCHOOL’S MISSION/VISION/AIMS)

Clongowes Wood College SJ seeks to:

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

We aim to achieve these goals while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us including third parties, contractors and vendors. The school wishes to achieve these aims/missions while fully respecting individuals’ rights to privacy and rights under the EU General Data Protection Regulation 2016/679 and other data protection legislation.

THE DATA WE COLLECT ABOUT YOU AND WHY

The Personal Data records held by the school **may** include:

A. 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 and contact details, PPS number
- Original records of application and appointment to promotion posts
- Details of approved absences (career breaks, parental leave, study leave etc.)
- Details of work record (qualifications, classes taught, subjects etc.)
- Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their school duties
- Records of any reports the school (or its employees) have made in respect of the staff member to State departments and/or other agencies under mandatory reporting legislation and/or child-safeguarding guidelines (subject to the DES Child Protection Procedures)
- Photographs and recorded images of staff (including at school events).

(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 resources management
- recording promotions made (documentation relating to promotions applied for) and changes in responsibilities etc.
- to enable the school to comply with its obligations as an employer including the preservation of a safe, efficient working and teaching environment (including complying with its responsibilities under the Safety, Health and Welfare At Work Act. 2005)
- photographs and recorded images of staff may be 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
- to enable the school to comply with requirements set down by the Department of Education and Skills, the Revenue Commissioners, the National Council for Special Education, TUSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies; and
- for compliance with legislation relevant to the school.

(c) **Lawful basis for processing:**

- Legal obligation for certain types of information such as deduction of income tax
- For the performance of a contract
- Article 9(2b) GDPR states that special categories of data (e.g. Health data) can be processed when: processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment

- To protect an employee's vital interest
- Because it is in the public interest or in the exercise of the official authority vested in the school

B. STUDENT RECORDS

(a) **Categories of student data:** These **may** include:

- Information which may be sought and recorded at enrolment and may be collated and compiled during the course of the student's time in the school. These records may include:
 - name, address and contact details, PPS number
 - date and place of birth
 - names and addresses of parents/guardians and their contact details (including any special arrangements with regard to guardianship, custody or access)
 - religious belief
 - racial or ethnic origin
 - whether they (or their parents) are medical card holders
 - whether English is the student's first language and/or whether the student requires English language support
 - any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply
- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements)
- Academic record – subjects studied, class assignments, examination results as recorded on official School reports
- Records of significant achievements
- Whether the student is repeating the Leaving Certificate
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Garda vetting outcome record (where the student is engaged in work experience organised with or through the school/ETB which requires that they be Garda vetted)
- Other records e.g. records of any serious injuries/accidents etc.
- Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).

(b) **Purposes:** The purposes for keeping student records are:

- to enable each student to develop to their full potential
- to comply with legislative or administrative requirements
- to ensure that eligible students can benefit from the relevant additional teaching or financial supports
- to support the provision of religious instruction
- to enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or to inform parents of school events etc.

- to meet the educational, social, physical and emotional requirements of the student
- photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school
- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirements for their course
- to ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- to furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other Schools etc. in compliance with law and directions issued by government departments
- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/ references to third-level educational institutions and/or prospective employers
- In respect of a work experience placement, (where that work experience role requires that the student be Garda vetted) the School will assist the student in obtaining their Garda vetting outcome (with the consent of the student and their parent/guardian) in order to furnish a copy of same (with the consent of the student and the student's parent/guardian) to the work experience employer.

(c) **Lawful basis for processing:**

- Legal obligation
- For the performance of a contract
- Consent for certain special category information
- To protect a pupil's vital interest
- Because it is in the public interest or in the exercise of the official authority vested in the school

C. 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 board of management)
- Records in relation to appointments to the Board
- Minutes of Board of Management meetings and correspondence to the Board which may include references to particular individuals.

(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) **Lawful basis for processing**

Legal basis

D. OTHER RECORDS

The school 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), and/or 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):

Parents' records

(a) **Categories of data:** the school may hold some or all of the following information about parents and/or guardians of pupils.

- Names, addresses and contact details (including any special arrangements with regard to guardianship, custody or access)
- Religious belief
- Racial or ethnic origin
- Occupation
- Financial circumstances if parents have requested and completed an Application Form for a College Bursary
- Bank details in order to facilitate fee arrangements and for the return of any booking deposit

(b) **Purposes:** The provision of emergency contact details for students. To enable the College to manage the school's financial affairs, including and the issuing of fee invoices.

(c) **Lawful basis for processing:**

- For the performance of a contract
- Consent for sensitive data, such as religious belief and racial or ethnic origin.

Prospective students and parents

(a) **Categories of data:** the school may hold some or all of the following information about prospective students and their parents and/or guardians:

- Names and addresses of prospective parents/legal guardians and their contact details (including any special arrangements with regard to guardianship, custody or access)
- Name, address and contact details, PPS Number, date and place of birth of prospective student
- Religious belief of prospective students and parents/guardians
- Racial or Ethnic Origin of prospective students and parents/guardians
- Occupation of prospective parents/legal guardians
- Information on prospective student's previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the prospective student)
- Psychological, psychiatric and/or medical assessments of the prospective student
- Financial circumstances if prospective parents have requested and completed an Application Form for a College Bursary

(b) **Purposes:** To facilitate the application process for prospective students.

(c) **Lawful basis for processing:**

Legitimate Interest

Alumni (former students)

(a) **Categories of data:** the school may hold the following data in relation to former students of the school:

- name
- residential address
- email address

- telephone number
 - correspondence
- (b) **Purposes:** Alumni contact information is kept for the following purpose:
- To inform alumni of social gatherings and alumni events held by the Past Pupils Union and/or the Clongowes Foundation.
 - To share College publications such as *The Clongownian*, *Clongowes Life*, and *Clongowes Digest* to ensure alumni are kept up to date with the activities of the College.
- (c) **Lawful basis for processing:**
Legitimate Interests

Clongowes Foundation Donors

- (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
 - correspondence
 - the gross amount of the donation.
- (b) **Purposes:** Donor contact information is kept for the following purpose:
- 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.
 - To share College publications such as *The Clongownian*, *Clongowes Life*, and *Clongowes Digest* to ensure donors are kept up to date with the activities of the College.
- (c) **Lawful basis for processing:**
- Legal basis
 - Legitimate Interests. In order to keep donors up to date with the activities of the College and wider Clongowes community

Third party creditors - vendors, contractors

- (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) **Lawful basis for processing:**

- For the performance of a contract
- Legal basis where the College is required to act as Principal Contractor under Relevant Contracts Taxation regulations set out by the Revenue Commissioners.

Golf Permit holders

(a) **Categories:** the school may hold some or all of the following information about people who hold a golf permit either directly with the College or through Clane Golf Club or are applying to hold a golf permit:

- name and address and contact details
- marital status for the permit holders eligible for the Couple permit fee
- date of birth for the permit holders eligible for the Senior permit fee
- date of birth for the permit holders eligible for the Junior permit rate.

(b) **Purposes:** This information is required for routine management and administration of the school's golf course licence agreement with Clane Golf Club, including the upkeep of the records of the payment of permit fee, and complying with audits and investigations by the Revenue Commissioners.

(c) **Lawful basis for processing:**

For the performance of a contract

CCTV images/recordings

(a) **Categories:** CCTV is installed, externally i.e. perimeter walls and internally as detailed in the CCTV Policy. These CCTV systems may record images of staff, students and members of the public who visit the premises.

(b) **Purposes:** Safety and security of staff, students and visitors and to safeguard school property and equipment. Cameras are located externally and internally as detailed in the CCTV Policy. Recording equipment is located in the office of the Head of Boarding and at Reception.

(c) **Lawful basis for processing:**

- Legitimate interests.
- CCTV is in operation in the school grounds for the safety and welfare of students and staff.

Examination results

(a) **Categories:** The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual, continuous assessment and mock- examinations results.

(b) **Purposes:** The main purpose for which these examination results and other records are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about subject choices and levels. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and such other similar bodies.

(c) **Lawful basis for processing:**
Legal basis

October Returns

(a) **Categories:** At the beginning of each academic year (and for 1st year or transferring students, on enrolment) parents/guardians and students are asked to provide the school with certain information so that the School can make returns to the Department of Education and Skills ("DES") referred to as "October Returns". These October Returns will include sensitive personal data regarding personal circumstances which are provided by parents/guardians and students on the basis of explicit and informed consent. The October Return contains individualised data (such as an individual student's PPS number) which acts as an "identifier" for the DES to validate the data that belongs to a recognised student. The DES also transfers some of this data to other government departments and other State bodies to comply with legislation, such as transfers to the Department of Social Protection pursuant to the Social Welfare Acts, transfers to the State Examinations Commission, transfers to the Educational Research Centre, and transfers to the Central Statistics Office pursuant to the Statistics Acts. The data will also be used by the DES for statistical, policy-making and research purposes. However the DES advises that it does not use individual data, but rather aggregated data is grouped together for these purposes. The DES has a data protection policy which can be viewed on its website (www.education.ie). The DES has also published a "Fair Processing Notice" to explain how the personal data of students and contained in October Returns is processed. This can also be found on www.education.ie (search for Circular Letter 0047/2010 in the "Circulars" section).

(b) **Purposes:** The school asks parents/guardians and students to complete October Returns for the purposes of complying with DES requirements to determine staffing and resource allocations and to facilitate the orderly running of the school. The main purpose of the October Returns is for the DES to determine whether the student qualifies for English language support and/or additional resources and support to meet their particular educational needs. The October Returns are submitted to the DES electronically. The DES has their own policy governing the security of the data sent to them by all post-primary schools. The cooperation of each student and/or their parents/guardians in completing the October Return is greatly appreciated as the school's aim is to ensure that each student is assisted in every way to ensure that /he meets his/her full potential.

(c) **Lawful basis for processing:**
Legal basis

HOW WE KEEP YOUR PERSONAL DATA SAFE

All the personal data collected by the College is stored securely by implementing appropriate organisational and technical measures. These measures are intended to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

WHO WE WILL SHARE YOUR PERSONAL DATA WITH

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the school doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent;
- pastoral or safeguarding files;
- behavioural assessments;
- psychological reports;
- Special Education Needs ('SEN') Reports.

The School may need to share personal data relating to its community with bodies, such as:

- Professional advisers (e.g. lawyers, insurers, accountants, pension advisers);
- Government authorities (e.g. DES, An Garda Síochána or the local authority);
- Appropriate regulatory bodies including the Charity Regulatory Authority, Independent Schools inspectorate;
- School General Practitioner; and
- School Catering Service Provider (in respect of disclosure of food allergies).

The School has a data sharing agreement with the Clongowes Past Pupil's Union and the Clongowes Wood College Foundation.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not transfer your personal data outside the European Economic Area (EEA).

HOW LONG WE KEEP YOUR PERSONAL DATA

The School will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, contractual, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the School's Privacy Manager at privacy@clongowes.net.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Where the relevant individual has so agreed, the school will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Past Pupil's Union and Clongowes Foundation;
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, for fundraising purposes.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy Manager in writing at privacy@clongowes.net. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising.

LINKS TO OTHER POLICIES AND TO CURRICULUM DELIVERY

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

The following policies may be among those considered:

- Admissions Policy
- CCTV Policy
- Subject Access Request Policy
- Retention of Records Policy
- IT Acceptable Usage Policy
- Personal Data Security Breach Code of Practice

PROCESSING IN LINE WITH DATA SUBJECT'S RIGHTS

Data in this school will be processed in line with your rights.

Under certain circumstances, you have rights under data protection laws in relation to your personal data including:

- The right to access your information
- The right to ask for information to be corrected
- The right to transfer your information to another party at your request
- The right of access to the Data protection Commissioner, and
- The right to ask us to stop processing your information, although this may mean we are unable to offer you the services of the college from that point forward.

If you wish to exercise any of the rights set out above, please contact the School's Privacy Manager at privacy@clongowes.net.

DEALING WITH A DATA ACCESS REQUEST

Under Article 15 of GDPR, you have the right to be informed whether the school holds data/information about you and to be given a description of the data together with details of the purposes for which your data is being kept.

No fee usually required - You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you - We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond - We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

DEALING WITH A DATA BREACH

The school takes its obligations to maintain the security of data very seriously. In the event of a personal data breach, the school's Personal Data Security Breach Code of Practice should be referred to.

PROVIDING INFORMATION OVER THE PHONE

In our school, any 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:

- Check the identity of the caller to ensure that information is only given to a person who is entitled to that information
- Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified

- Refer the request to the Headmaster/Deputy Headmaster for assistance in difficult situations. No employee should feel forced into disclosing personal information.

IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES

In our school the board of management is the data controller and the Headmaster will be assigned the role of coordinating implementation of this Data Protection Policy and for ensuring that staff who handle or have access to *Personal Data* are familiar with their data protection responsibilities.

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

Name	Responsibility
Board of management:	Data Controller
Headmaster:	Implementation of Policy
Director of Finance and Administration:	Privacy Manager
Senior Management Team	Information Asset Managers
All Staff	Adherence to Policy

RATIFICATION & COMMUNICATION

When the Data Protection Policy has been ratified by the board of management, it becomes the school's agreed Data Protection Policy. It should then be dated and circulated within the school community. The entire staff must be familiar with the Data Protection Policy and ready to put it into practice in accordance with the specified implementation arrangements. It is important that all concerned are made aware of any changes implied in recording information on students, staff and others in the school community.

Parents/guardians and students should be informed of the Data Protection Policy from the time of enrolment of the student e.g. by including the Data Protection Policy as part of the Enrolment Pack, by either enclosing it or incorporating it as an appendix to the enrolment form.

MONITORING THE IMPLEMENTATION OF THE POLICY

The implementation of the policy shall be monitored by the Headmaster and Senior Management Team.

At least one annual report should be issued to the board of management to confirm that the actions/measures set down under the policy are being implemented.

REVIEWING AND EVALUATING THE POLICY

On-going review and evaluation of this policy should take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills), legislation and feedback from parents/guardians, students, school staff and others. The policy should be revised as necessary in the light of such review and evaluation and within the framework of school planning. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practical.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the School's Privacy Manager using the following email address *privacy@clongowes.net*.

If you believe that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should notify the Privacy Manager at *privacy@clongowes.net*. You can also make a referral to or lodge a complaint with the Office of the Data Protection Commissioner (ODPC) at www.dataprotection.ie.

Signed:



Date: 17 May 2018

Mr. Peter Gray
Chair, Board of Management