

COSAINT SONRAÍ: SCOIL NA LEANAÍ 2024-2025

RÉAMHRÁ

Baineann Polasaí na scoile um Chosaint Sonraí le **sonraí pearsanta** ata á gcoinneáil ag Bord Bainistíochta na scoile, atá faoi chosaint ag na hAchtanna um Chosaint Sonraí 1988 go 2018 agus ag Rialachán Ginearálta um Chosaint Sonraí an AE (RGCS).

Baineann an polasaí seo le gach ball foirne, leis an mBord Bainistíochta, le tuismitheoirí/caomhnóirí, le daltaí agus leo eile (daltaí féideartha nó ionchasacha agus a dtuismitheoirí san áireamh agus iarrthóirí ar phoist laistigh den scoil) chomh fada agus a bhaineann na céimeanna sa pholasaí leo. Déanfar sonraí a stóráil go slán, le go gcosnaítear faisnéis rúnda de réir na reachtaíochta ábhartha. Leagann an polasaí seo amach an bealach ar a ndéanann an scoil sonraí pearsanta agus catagóirí speisialta na sonraí pearsanta a chosaint.

Feidhmíonn Scoil na Leanaí modh an “**Phríobháideachais trí dhearadh**” maidir le Cosaint Sonraí. Ciallaíonn sé seo go ndéanaimid pleanáil chúramach agus sonraí pearsanta á mbailiú againn le gur féidir linn na **prionsabail chosanta sonraí** a chur isteach roimhre mar phointí bunúsacha i ngach feidhmíocht a bhaineann le sonraí. Déanaimid iniúchadh ar na sonraí pearsanta atá á gcoinneáil againn le gur féidir linn

1. rochtain a sholáthar do do dhaoine ar a gcuid sonraí
2. é a chinntiú go bhfuil siad á gcoinneáil go slán
3. ár nósanna imeachta um chosaint sonraí a thaifeadadh
4. cuntasacht agus trédhearcacht a fhorbairt

PRIONSABAIL NA COSANTA SONRAÍ

Is *Rialaitheoir Sonraí ar shonraí pearsanta* é Bord Bainistíochta na scoile a bhaineann le baill foirne, daltaí, tuismitheoirí/caomhnóirí agus baill eile an scoilphobail san aimsir atá thart, sna laethanta seo agus sa todhchaí. Chuige seo, tá dualgas ar an mBord cloí leis na prionsabail chosanta sonraí mar atá leagth amach sna hAchtanna um Chosaint Sonraí 1988 go 2018 agus sa RGCS, ar a ndéantar achóimre orthu sa méid seo a leanas:

1. **Sonraí Pearsanta a Fháil agus a Phróiseáil ar bhealach cothrom**

Bailítear faisnéis ar dhaltaí le cabhair a dtuismitheoirí/a gcaomhnóirí agus na foirne. Aistrítear faisnéis freisin ó na scoileanna ina raibh siad. Maidir le faisnéis atá á coinneáil ag an scoil faoi dhaoine eile (baill na foirne, daoine atá ag cur isteach ar phostanna, tuismitheoirí/caomhnóirí na ndaltaí srl.), go ginearálta, is iad na daoine féin a thugann an fhaisnéis, le toiliú iomlán, eolach agus cuirtear le chéile í le linn a dtréimhse fostaíochta nó theagmhála leis an scoil. Pléitear leis an bhfaisnéis seo ar fad faoi réir na reachtaíochta um Chosaint Sonraí agus faoi théarmaí an Pholasaí seo um Chosaint Sonraí. Déanfar an fhaisnéis seo a fháil agus a phróiseáil ar bhealach cothrom.

2. **Toiliú**

Nuair is é a toiliú an bunús le soláthar sonraí pearsanta, (m.sh. sonraí atá riachtanach le bheith i do bhall d'fhoireann spóirt/d'imeacht iarscoile nó d'aon imeachtaí eile roghnach) ní mór toiliú don phróiseáil a thabhairt go saor, go sonrach, ní mór don duine a bheith eolach ar na cúinsí. Ba cheart go mbeadh mianach an duine is ábhar do na sonraí a bheith soiléir. Beidh ráiteas nó gníomhaíocht shoiléir dhearfach ag teastáil ó Scoil na Leanaí,, m.sh. ticeáil bosca/síniú cáipéisí le toiliú a léiriú. Is féidir leis an duine is ábhar do na sonraí an toiliú a tharraingt siar sna cásanna seo.

3. Coinnigh é chun críoch(a) sonraithe agus ar bhonn follasach dleathach

Cuirfidh an Bord Bainistíochta daoine ar an eolas faoi na cúiseanna go bhfuil siad ag bailiú na sonraí agus faoin úsáid a mbainfear astu. Coinnítear gach faisnéis le leas an duine aonair ar intinn againn i gcónaí.

4. Na sonraí a phróiseáil ar bhealaí a thagann leis na cúiseanna ar a bailíodh iad i dtús báire

Déanfar sonraí a bhaineann le daoine aonair a phróiseáil ar bhealaí a thagann leis na cúiseanna ar a bailíodh na sonraí. Ní roinnfear eolas ach ar bhonn gá-le-fios agus beidh diannrialú ar an rochtain ar na sonraí sin.

5. Sonraí Pearsanta a choinneáil slán agus sábháilte

Ní bheidh rochtain ar na sonraí ach acu siúd a bhfuil fórchúis acu len e a fháil. Tá sonraí pearsanta á stóráil faoi ghlas nuair is taifid ó lámh iad agus faoi chosaint ag bogearra ríomhaire agus pasfhocail i gcás sonraí atá á gcoinneáil go leictreonach. Tá criptiú agus pasfhocail ar ghléasra iniompartha (ar nós ríomhaire glúine) ar a bhfuil sonraí pearsanta á stóráil.

6. Sonraí Pearsanta a choinneáil cruinn, iomlán agus thuas chun dáta

Ba cheart do dhaltáí, do thuismitheoirí/chaomhnóirí, agus/nó baill na foirne an scoile chur ar an eolas faoi aon athrú atá le déanamh ar a gcuid sonraí pearsanta nó ar a gcuid sonraí pearsanta íogaire le cinntiú go bhfuil sonraí an duine sin cruinn, iomlán agus thuas chun dáta. Ar insint dóibh, ba cheart don scoil pé athrú atá le déanamh a dhéanamh ar na taifid ábhartha. Ní féidir taifid a athrú nó a léirscriosadh gan an t-údarú ceart. Má tá athrú/ceartú ag teastáil, ba cheart nóta a dhéanamh den údarú agus de na hathruithe atá le déanamh ar aon bhunchóip de thaifead nó de cháipéis agus an dáta agus síniú an duine atá ag déanamh na n-athruithe a chur leis.

7. É a chinntiú go bhfuil na sonraí fónta, ábhartha agus nach siad iomarcach

Ní bhaileofar agus ní stóralfar ach méid riachtanach na faisnéise atá ag teastáil chun seirbhís fónta a sholáthar

8. É a choinneáil ní níos sia ná mar is riachtanach don chúis/do na cúiseanna sonraithe ar a tugadh é

Mar riail ghinearálta, coinneofar an fhaisnéis ar feadh tréimhse an duine sa scoil. I ndiaidh sin, leanfaidh an scoil treoirínte na Roinne Oideachais maidir le stóráil na sonraí pearsanta a bhaineann leis an dalta. I gcás na mball foirne, cloífidh an scoil le treoracha na Roinne Oideachais agus le riachtanais Oifig na gCoimisinéirí Ioncaim maidir le coinneáil na dtaifead a bhaineann le fostaithe. D'fhéadfaí go gcoinneodh an scoil na sonraí a bhaineann le duine aonair ar feadh tréimhse ama níos sia chun cloí le forálacha ábhartha dlí agus/nó chun éileamh a chosaint faoi reachtaíocht fostaíochta agus/nó do chonradh agus/nó don dlí sibhialta. Féach tábla [Coinneáil na dTaifead Scoile](#)

9. Cóip dá Sonraí Pearsanta a sholáthar do dhuine ar bith ar iarratas

Tá sé de cheart ag duine aonair rochtain a fháil ar na sonraí pearsanta atá á gcoinneáil fúthu agus a bheith ar an eolas fúthu, faoin duine atá á gcoinneáil agus faoin gcúis go bhfuil siad á gcoinneáil.

ScóIP

Baineann an reachtaíocht um Chosaint Sonraí le coinneáil agus le próiseail *Sonraí Pearsanta*. An críoch leis an bpolasaí seo ná cabhrú leis an scoil a cuid oibleagáidí reachtúla a chomhlíonadh, na hoibleagáidí sin a mhíniú d'fhoireann na scoile agus foireann na scoile, daltaí, a dtuismitheoirí/gcaomhnóirí conas a dhéanfar a gcuid sonraí a phróiseáil.

Baineann an polasaí seo le gach ball foirne, leis an mBord Bainistíochta, le tuismitheoirí/caomhnóirí, le daltaí agus leo eile (daltaí ionchasacha agus a dtuismitheoirí/gcaomhnóirí san áireamh, chomh maith le hiarrthóirí ar phoist sa scoil) fad is atá an scoil ag láimhseáil agus ag próiseáil a gcuid *Sonraí Pearsanta* ar feadh a dteagmhála leis an scoil.

Sainmhíniú ar Théarmaí Cosanta Sonraí

Chun tuiscint cheart a fháil ar na hoibleagáidí ar an scoil, tá téarmaí áirithe tábhachtacha, ar cheart do gach ball foirne ábhartha iad a thuiscint:

Sonraí Pearsanta duine ar bith aiceanta aitheanta nó inaitheanta i.e. duine beo ar féidir nó a bhféadfaí iad a aithint ó na sonraí nó i bpáirt le faisnéis eile atá i seilbh, nó atá le bheith i seilbh an Rialthóra Sonraí (Bord Bainistíochta).

Rialaitheoir Sonraí is ea Bord Bainistíochta na scoile

Duine is ábhar do na Sonraí - duine is ábhar do na sonraí pearsanta

Próiseáil Sonraí – aon oibríocht nó tacar oibríochtaí a dhéanamh ar na sonraí:

- Fáil, taifeadadh, coinneáil na sonraí,
- Bailiú, eagú, stóráil, athrú, nó cur in oiriúnt na sonraí
- Aisghabháil, féachaint ar, nó úsáid a bhaint as, na sonraí
- Na sonraí a nochtadh trí tharchur, trí scaipeadh nó iad a chur ar fáil trí bhealach eile
- Na sonraí a ailíniú, a chónascadh, a bhlocáil, a ghlanadh, nó a léirsciosadh

Próiseálaí Sonraí – duine a dhéanann sonraí pearsanta a phróiseail thar ceann an Rialaitheora Sonraí, **ach ní fostaí an Rialthóra Sonraí** a dhéanann a leithéid de shonraí a phróiseail le linn a dtréimhse fostaíochta le, chiallódh sé seo b'fheidir fostaí eagrais a gcuieann an Rialaitheoir Sonraí obair chucu. Leagann an reachtaíocht um Chosaint Sonraí freagrachtaí ar na heagrais seo maidir lena bpróiseáil sonraí.

Catagóirí Speisialta Sonraí Pearsanta a thagraíonn do *Shonraí Pearsanta* maidir leis na gnéithe seo a leanas

- Bunadh ciníoch nó eitneach
- Tuairimí polaitiúla nó creidimh religiúnda nó fealsúnach
- Sláinte fhisiciúil nó mheabhrach
- Saol gnéis agus claonadh gnéis
- Sonraí géiniteacha agus bithmhéadracha
- Ciontuithe Coiriúla nó líomhaintí faoi dhéanamh coire
- Ballraíocht Cheardchumainn

Sárú ar Shonraí Pheasanta – sárú ar shlándaíl as a dtagann léirscriosadh timpisteach nó mídhleathach, cailleadh, athrú, nochtadh neamhúdaraíthe, nó rochtain ar na sonraí pearsanta a tharchuirtear, a stóráltar nó a phróiseáiltear ar bhealach eile. Is ionann é seo agus aon chur isteach ar nó caillteanas sonraí, beag beann ar cá háit a dtarlaíonn sé nó conas a tharlaíonn sé.

RÉASÚNAÍOCHT

Chomh maith leis na hoibleagáidí dlíthiúla atá ar an scoil faoi shainchúraimí fairsinge na reachtaíochta oideachais, tá oibleagáid dhíthiúil ar an scoil cloí leis na hAchtanna um Chosaint Sonraí 1988 go 2018 agus leis an RGCS.

Míníonn an polasaí seo cén saghas sonraí a bhailítear, cen fáth go mbailítear iad, an tréimhse choinneála agus cé leis a roinnfear iad. Tá an scoil an-dáiríre faoina bhfreagrachtaí faoin dlí um Chosaint Sonraí agus is mian leo cleachtais shábháilte a chur i bhfeidhm chun sonraí pearsanta an duine aonair a chumhdach. Aithnítear gur n-éascaíonn taifeadadh ceart agus stóráil shlán an eolais fhíorasaigh measúnú an eolais le go mbeidh an Príomhoide agus an Bord Bainistíochta in ann cinntí a dhéanamh maidir le rith éifeachtach na scoile. Tá láimhseáil éifeachtúil na sonraí de dhíth freisin chun buanseasmhacht agus leanúnachas a chinntiú mar a bhfuil athruithe na bpearsanra laistigh den scoil agus lasistigh den Bhord Bainistíochta.

OIBLEAGÁIDÍ EILE DLÍTHIÚLA

Le cur i bhfeidhm an pholasaí seo, cuirtear oibleagáidí agus freagrachtaí eile dlíthiúla na scoile san áireamh. Tá dlúthbhaint ag cuid acu seo le Cosaint Sonraí. **Mar shampla:**

Faoi **Alt 9(g) den Acht Oideachais, 1998**, caithfear rochtain a thabhairt do thuismitheoir dalta, nó do dhalta atá os cionn 18 mbliana d'aois, ar na taifid atá á gcoinneáil ag an scoil maidir le dul chun cinn oideachasúil an dalta sin.

Faoi **Alt 20 den Acht Oideachais (Leas), 2000**, caithfidh an scoil clárleabhar a choinneáil de na páistí atá ag freastal ar an scoil

Faoi **Alt 20(5) den Acht Oideachais (Leas), 2000**, tá dualgas ar Phríomhoide eolas áirithe faoi thinreamh páiste ar an scoil agus faoi chúrsaí eile a bhaineann le dul chun cinn oideachasúil an pháiste a roinnt le príomhoide scoile eile a bhfuil an páiste ag aistriú chuici. Cuireann Scoil na Leanaí, tríd an bpost, cóip de *Phas* an pháiste, atá curtha ar fáil ag an gComhairle Náisiúnta Curaclaim agus Measúnachta, chuig Príomhoide na meánscoile ina bhfuil an páiste rollaithe.

Nuair atá tuairiscí déanta ag daoine gairmiúla, seachas foireann Scoil na Leanaí mar chuid de chomhaid an dalta reatha, ní thugtar na tuairiscí seo chuig an Meánscoil mura bhfuil cead dearfa, scríofa lorgtha agus faighte ó thuismitheoir(í) an dalta sin.

Faoi **Alt 21 den Acht Oideachais (Leas), 2000**, caithfidh an scoil tinreamh nó neamhthinreamh na ndaltaí cláraithe a thaifeadadh ar gach lá scoile.

Faoi **Alt 28 den Acht Oideachais (Leas), 2000**, is ceadmhach don scoil *Sonraí Pearsanta* atá á gcoinneáil acu a sholáthar do fhorais áirithe fhorordaithe (An Roinn Oideachais ags Scileanna, Tusla, an Chomhairle Náisiúnta um Oideachas Speisialta agus scoileanna eile). Caithfidh an Bord Bainistíochta a bheith sásta go mbainfear úsáid as na sonraí ar "chúiseanna ábhartha" (a chuimsíonn taifeadadh ar stair oideachais agus oiliúna an duine nó monatóireacht ar an dul chun cinn oideachasúil nó oiliúna; nó chun taighde a

dhéanamh ar scrúduithe, ar rannpháirtíocht san oideachas agus ar éifeacht ghinearálta an oideachais nó na hoiliúna)

Faoi **Alt 14 den Acht um Oideachas do Dhaoine a bhfuil Riachtanais Speisialta Oideachais Acu, 2004**, is gá don scoil aon fhaisnéis atá á lorg ó am go chéile, ar bhealach réasúnta, ón gComhairle Náisiúnta um Oideachas Speisialta a sholáthar don Chomhairle (agus dá fostaithe, a chuimseodh ERSO).

Forálann **An tAcht um Shaoráil Faisnéise 2014** go bhfuil ceart áirithe ar rochtain ar fhaisnéis atá á coinneáil ag forais phoiblí nach gá di a bheith ina “sonraí pearsanta”, mar atá leis an reachtaíocht um chosaint sonraí. Cé nach bhfuil móramh na scoileanna faoi réir na reachtaíochta um shaoráil faisnéise, (eisceacht is ea na scoileanna faoi threoir an Bhoird Oideachais ags Oiliúna), má tá an scoil tar éis faisnéis a sholáthar d’fhoras atá faoi réir an Achta um Shaoráil Faisnéise (cosúil leis an Roinn Oideachais gas Scileanna srl.) d’fhéadfaí go roinnfeadh an foras sin na taifid dá ndéanfaí iarratas orthu.

Faoi **Alt 26(4) den Acht Sláinte, 1947**, tabharfaidh an scoil gach áis réasúnta (áiseanna chun aimneacha agus seoltaí na ndaltaí atá ag freastal ar an scoill) don Údarás Sláinte atá tar éis iniúchadh sláinte a fhógairt uirthi m.sh. iniúchadh fioclóireachta

Faoi **Acht um Thús Áite do Leanaí 2015**, tá dualgas ar dhaoine faoi shainordú sna scoileanna imní faoi leas páistí a thuairisciú do TÚSLA – an Ghníomhaireacht um Leanaí agus an Teaghlach (nó i gcás eigeandála agus in éagmais TÚSLA, don Gharda Síochána)

GAOL LE SAINSPRID NA SCOILE:

Cuireann Scoil na Leanaí romhainn:

- É a chur ar chumas na ndaltaí barr a gcumas a bhaint amach
- Timpeallacht foghlama slán sábháilte a sholáthar
- Meas a chothú ar éagsúlacht na luachanna, na gcreideamh, na dtraidisiún, na dteangacha, agus na modhanna maireachtála sa tsochaí

Tá sé mar aidhm againn é seo a bhaint amach agus meas á léiriú ar na cearta príobháideachais agus cosant sonraí ata ag na daltaí, na baill foirne, na tuismitheoirí/caomhnóirí agus iad eile a bhíonn ag plé linn. Is mian leis an scoil na haidhmeanna/na misin seo a bhaint amach agus meas iomlán a léiriú againn ar cearta daoine chun an phríobháideachais agus a gceart faoin reachtaíocht um Chosaint Sonraí.

SONRAÍ PEARSANTA

D’fhéadfaí go gcuimseodh na taifid atá ag an scoil na *sonraí pearsanta* seo a leanas:

1. Taifid na Foirne:

a. Catagóirí na Sonraí Foirne:

Chomh maith le baill foirne atá ann cheanna féin (agus iarbhaill na foirne), d’fhéadfaí go mbainfeadh na taifid seo le hiarrthóirí ar phoist sa scoil, múinteoirí ar oiliúint agus múinteoir faoi phromhadh. D’fhéadfadh go gcuimseodh na taifid foirne seo:

- Ainm, seoladh, sonraí teagmhála, uimhir PSP.
- Ainm, sonraí teagmhála neasghaoil i gcás éigeandála.

- Taifid bhunaidh d'iaratas agus de cheapacháin do phoist freagrachta
- Sonraí de neamhláithreachtaí faofa (sos gairme, saoire tuismitheora, saoire staidéir, srl.)
- Sonraí an taifid oibre (cáilíochtaí, ranganna a múineadh, ábhair, srl.)
- Sonraí aon timpiste/ghotú a bhain do bhall foirne ar láthair na scoile nó a raibh baint acu le comhlíonadh na ndualgas scoile
- Taifid ar aon tuairiscí a rinne an scoil (nó a cuid fostaithe) maidir le ball foirne do Ranna Stáit agus/nó d'aon ghníomhaireacht eile faoin Acht um Thús Áite do Leanaí 2015

b. *Cúiseanna:*

Coinnítear taifid foirne ar na cúiseanna seo a leanas:

- Bainistíocht agus riaradh ghnó na scoile (faoi láthair agus amach anseo)
- Éascú a dhéanamh ar íocaíocht na foirne agus chun leasa/teidlíochtaí eile (seirbhís ináirithe chun íocaíochtaí pinsin, teidlíochtaí agus/nó íocaíochtaí iomarcaíochta a áireamh, nuair is cuí)
- Éascú a dhéanamh ar íocaíocht pinsin amach anseo
- Bainistíocht ar acmhainní daonna
- Ardaithe Céime a thaifeadadh (caipéisíocht a bhaineann le hiarratais ar adú céime) agus athruithe sna freagrachtaí, srl.
- Le cur ar chumas na scoile a cuid oibleagáidí mar fhostaithe a chomhlíonadh, caomhnú timpeallachta sábháilte, éifeachtúile don obair agus don mhúineadh san áireamh, (comhlíonadh na bhfreagrachtaí faoin Acht um Shábháilte, Sláinte agus Leasa ag an Obair 2005 san áireamh)
- Le cur ar chumas na scoile na riachtanais, atá leagtha síos ag an Roinn Oideachais, ag TÚSLA, ag na Coimisinéirí Ioncaim, ag an gComhairle Náisiúnta um Oideachas Speisialta, ag an bhFSS, agus ag aon roinn nó ghníomhaireacht eile rialtais, reachtúil agus/nó rialála, a chomhlíonadh
- Chun cloí le reachtaíocht ábhartha don scoil.

c. *Súiomhanna agus Nósanna Imeachta Slándála Scoil na Leanaí:*

- a. Coinnítear taifid laimhe i gcófraí comhaid slána faoi ghlas in oifig riaracháin faoi ghlas nach mbíonn fáil orthu ach ag daoine údaraithe chun a sonraí a úsáid. Caithfidh fostaithe rúndacht na sonraí a bhfuil rochtain acu othu a chaomhnú.
- b. Stóráltar taifid dhigiteacha ar ríomhairí faoi chosaint phasfhocail in oifig faoi ghlas.
- c. I gcás éigeandála, d'fhéadfaí go mbeadh ar na múinteoirí ríomhaire na scoile a thógáil abhaile leo. Sa chás seo, ní fhagfaidh an ríomhaire an teach

2. *Taifid na nDaltaí:*

a. *Catagóirí Sonraí na nDaltaí:*

D'fhéadfaí go gcuimseodh siad seo:

- Faisnéis a lorgófaí agus a thaifeadfaí ag am rollaithe agus d'fhéadfaí go gcuirfí i dtoll a cheile iad le linn tréimhse an dalta sa scoil. D'fhéadfaí go gcuimseodh na taifid seo:
 - Ainm, seoladh agus sonraí teagmhála, uimhir PSP
 - Dáta breithe agus áit bhreithe
 - Ainmneacha agus seoltaí na dtuismitheoirí/gcaomhnóirí agus a gcuid sonraí teagmhála (aon socruithe speisialta maidir le caomhnóireacht, cúram, nó rochtain san áireamh)

- Creideamh reiligiúnda
- Bunadh ciníoch nó eitneach
- Más sealbhóir cárta leighis iad (nó a dtuismitheoirí)
- Más é an Béarla máthairtheanga an dalta agus/nó má tá tacaíocht ón dalta le Béarla
- Aon choinníollacha speisialta ábhartha (m.sh. riachtanais speisialta oideachais, deacrachtaí sláinte, srl.) a bheadh tábhachtach
- Faisnéis ar an taifead acadúil roimhe seo (tuairiscí, tagairtí measúnuithe agus taifid eile) ó scoileanna ar a fhreastail an dalta roimhe seo
- Measúnuithe siceolaíochta, síciatracha agus/nó leighis
- Taifid ar an tinreamh
- Déantar grianghraif agus íomhanna taifeadta de na daltaí (ócáidí scoile agus ag aithint gaiscí san áireamh) a bhainistiú ar bhealach a chloíonn leis an bPolasaí um Ghrianghrafadóireacht Scoile.
- Taifead Acadúil – na hábhair ar a ndearnadh staidéar, tograí ranga, torthaí scrúdaithe mar a thaifeadadh ar na tuairiscí oifigiúla scoile
- Taifid ar ghaiscí suntasacha
- Taifid ar chásanna/fhiosrúcháin smachta agus/nó na smachtbhannaí a gearradh
- Taifid eile m.sh. taifid ar aon ghortú dairíre/timpistí srl. (Nóta: Moltar go gcuireann ball foirne na tuismitheoirí ar an eolas go bhfuil eachtra ar leith á thaifeadadh).
- Taifid ar aon tuairisc atá déanta ag an scoil (nó ag a fostaithe) chuig Ranna Stáit agus/nó aon ghníomhaireacht eile faoin Acht um Thús Áite do Leanaí 2015.

b. Cúiseanna: Cuimsíonn an chúis le coinneáil thaifid na ndaltaí:

- Le cur ar chumas gach dalta barr a c(h)umas a bhaint amach
- Le riachtanais reachtúla nó riaracháin a chomhlíonadh
- Le cinntiú gur féidir le daltaí incháilithe leas a bhaint as na tacaíochtaí breise ábhartha múinteoireachta nó airgeadais
- Le tacú le soláthar na hoiliúna reiligiúnda
- Le gur féidir teagmháil a dhéanamh leis na tuismitheoirí/caomhóirí i gcás éigeandála nó i gcás dhúnadh na scoile, nó chun tuismitheoirí a chur ar an eolas faoi dhul chun cinn oideachais a bpáiste nó chun tuismitheoirí a chur ar an eolas faoi imeachtaí scoile srl.
- Le freastal ar riachtanais oideachais, shóisialta, fhisiciúil, agus mhothúchanach an dalta
- Tógtar grianghraif de na daltaí chun gaiscí scoile a cheiliúradh, m.sh. leabhar bliana a chur le chéile, suíomh idirlín a bhunú, imeachtaí scoile a thaifeadadh, agus chun stair na scoile a thaifeadadh. Tógtar agus úsáidtear na taifid seo de réir an *Pholasaí um Ghrianghrafadóireacht Scoile* agus an *Ráitis um Pholasaí um Phríobháideachas don Suíomh Idirlín Scoile*.
- Le cinntiú go gcomhlíonann an dalta criteir iontrála na scoile
- Le cinntiú go gcomhlíonann na daltaí na riachtanais faoin aois íosta le freastal ar an mbunscoil.
- Le cáipéisíocht/faisnéis faoin dalta a sholáthar don Roinn Oideachais agus Scileanna, don Chomhairle Náisiúnta um Oideachas Speisialta, do TUSLA, agus do scoileanna eile, srl. ag comhlíonadh an dlí agus na dtreoracha atá eiseithe ag na Ranna Rialtais
- Le cáipéisíocht/faisnéis/teistiméireachtaí a sholáthar d'institiúidí oideachais dara leibhéal nuair a iarrann dalta (nó a dtuismitheoirí/gcaomhnóirí i gcás dalta nach bhfuil 18 mbliana d'aois).

c. *(Suíomhanna agus Nósanna Imeachta Slándála mar atá thuas):*

3. Taifid an Bhoird Bhainistíochta:

a. *Catagóirí Sonraí an Bhoird Bhainistíochta:*

- Ainm, seoladh, sonraí teagmhála do gach Ball an Bhoird Bhainistíochta (iarbhaill an Bhoird Bhainistíochta san áireamh)
- Taifid a bhaineann le ceapacháin chun an Bhoird
- Miontuairiscí na gcruinnithe Boird Bhainistíochta agus comhfhreagras leis an mBord a dhéanann tagairt do dhaoine aonair.

b. *Cúiseanna:*

Le cur ar chumas an Bhoird Bhainistíochta feidhmiú de réir an Achta um Oideachas 1998 agus de réir reachtaíochta eile ábhartha agus chun taifid a choinneáil ar cheapacháin chun an Bhoird agus ar chinntí.

c. *(Suíomhanna agus Nósanna Imeachta Slándála mar atá thuas):*

4. Taifid Eile: Creidiúnaithe

a. *Catagóirí Sonraí an Bhoird Bhainistíochta:*

D'fhéadfadh an scoil an fhaisnéis seo a leanas a choinneáil faoi chreidiúnaithe (cuid acu atá ina ndaoine féinfhostaithe):

- Ainm
- Seoladh
- Sonraí teagmhála
- Uimhir PSP
- Sonraí Cánacha
- Sonraí Baint
- Méid Íoctha

b. *Cúiseanna: Na cúiseanna le taifid na gCreidiúnaithe a choinneáil ná:*

Tá an fhaisnéis seo riachtanach chun ghnáthbhainistíocht agus riarachán a dhéanamh ar chúrsaí airgeadais na scoile, ina gcuimsítear íocaíocht sonrasc, cur le chéile na gcuntas aigeadais bliantúil, agus cloí le hiniúchadh agus le fiosrúcháin na gCoimisinéirí Ioncaim.

c. *(Suíomhanna agus Nósanna Imeachta Slándála mar atá thuas):*

5. Taifid Eile: Foirmeacha Cáin-ar-ais na Carthanachta

a. *Catagóirí sonraí an Bhoird Bhainistíochta:*

D'fhéadfadh Scoil na Leanaí na sonraí seo a leanas maidir le deontóirí atá tar éis tabhartais charthanachta a dhéanamh leis an scoil:

- Ainm
- Seoladh
- Sonraí teagmhála
- Uimhir PSP
- Ráta Cánach
- Síniú
- Méid chomhlán an tabhartais roimh cháin.

b. Cuiseanna: Na cúiseanna ar a gcoinnítear taifid na nDeonteoirí Carthanachta ná:

Tá scoileanna i dteideal leas a bhaint as scéim don fhaoiseamh cánach do thabhartais airgid a fhaigheann siad. Chun an faoiseamh a fháil, caithfidh an deontóir teastas (CHY2) a líonadh agus é a chur chuig an scoil le ligean dóibh méid chomhlán na cánach a bhaineann leis an tabhartais a fháil ar ais. 'Sí an fhaisnéis a a iarrtar ar an teastas cuí ná ainm an tuismitheora, seoladh an tuismitheora, uimhir PSP an tuismitheora, ráta canach an tuismitheora, uimhir ghutháin an tuismitheora, síniú an tuismitheora agus méid chomhlán an tabhartais. Coinníonn an scoil é seo i gcás iniúchta ag na Coimisinéirí Ioncaim.

c. (Suíomhanna agus Nósanna Imeachta Slándála mar atá thuas):

TAIFEADTAÍ/ÍOMHÁNNA TCI-

Tá TCI curtha isteach i Scoil na Leanaí.

---- Tá ceamaraí curtha isteach lasmuigh

- Tá ceamara laistigh de phríomhdhoras na scoile.
- Ar an gclós lasmuigh,
- Ar an gceantar os comhair na scoile.
- Ar an gcosán taobh thiar den scoil
- Ar an gcúinne lasmuigh den scoil.
- Ar an gcúirt chispheile.

D'fhéadfaí go ndéanadh na córais TCI taifeadadh ar bhaill foirne, ar dhaltaí agus ar bhaill an phobail a thagann ar chuairt go dtí an scoil.

Tá an stáisiún radhairc in oifig an phríomhoide.

Cúiseanna:

Sábháilteacht agus slándáil na foirne, na ndaltaí agus na gcuariteoirí a chinntiú agus chun maoin agus trealamh na scoile a chaomhnú.

Slándáil:

Níl rochtain ach ag Príomhoide nó Príomhoide Tánaisteach na scoile ar íomhánna/taifeadtaí. Coinnítear taifeadtaí ar feadh 28 lá, ach amháin sa chás go bhfuil siad ag teastáil chun eachtra a fhiosrú. Is féidir íomhánna/taifeadtaí a chur ar fáil don Gharda Síochána de bhun reachtaíocht na nAchtanna um Chosaint Sonraí.

TORTHAÍ SCRÚDUITHE

Coinneoidh an scoil sonraí faoi thorthaí scrúduithe na ndaltaí. Cuimsíonn siad seo torthaí an ranga, an mheántéarma, na bliana, na measúnuithe leanúnacha agus torthaí na dtrialacha caighdeánaithe

Cúiseanna:

An phríomhchúis leis na torthaí scrúduithe seo ná monatóireacht a dhéanamh ar dhul chun cinn oideachasúil an dalta agus chun bunús iontaofa a bheith ag an múinteoir chun

comhairle cheart a chur ar dhaltai agus ar a dtuismitheoirí faoi leibhéil ghnóthachtála oideachasúla agus chun moltaí a dhéanamh faoin todhchaí. D'fhéadfaí go gcuirfí na sonraí le chéile ar son cúiseanna staidrimh/tuairiscithe, ar nós táblaí na dtorthaí. D'fhéadfaí go n-aistreofar na sonraí chuig an Roinn Oideachais agus Scileanna, chuig an gComhairle Náisiúnta Curaclaim agus Measúnachta agus chuig scoileanna eile a n-aistríonn daltaí chucu.

Súiomhanna agus Nósanna Imeachta Slándála

Mar atá thuas

NAISC LE POLASAITHE EILE AGUS LE SEACHADADH AN CHURACLAIM

Caithfidh ár bpolasaithe scoile teacht le chéile, lasitigh de chreat iomlán an Phlean Scoile. Déanfar scrúdú ar na polasaithe ábhartha atá ann cheana féin, nó atá á bhforbairt nó faoi athbhreithniú, maidir leis an *bPolasaí um Chosaint Sonraí* agus tabharfar aghaidh ar aon impleachtaí dóibh.

D'fhéadfaí go bhféachfar ar na polasaithe seo a leanas:

- Bunachar Sonraí ar líne do bhunscoileanna (POD): Bailiú na sonraí chun bunachar na ndaltaí ar líne na Roinne Oideachais agus Scileanna a chomhlíonadh
- Nósanna Imeachta um Chosaint Leanaí
- Nósanna Imeachta Friththromaíochta
- Cód Iompair
- Polasaí um Rollú
- Polasaí um Úsáid Inghlactha don TFI
- Polasaí um Riachtanais Speisialta Oideachais
- Polasaí um Theagmhas Criticiúil
- Polasaí um Thinreamh

PRÓISEÁIL A THAGANN LE CEARTA NA nDAOINE IS ÁBHAIR DO NA SONRAÍ

Déanfar sonraí sa scoil seo a phróiseáil ar bhealach a thagann le cearta an duine is ábhar do na sonraí. Tá sé de cheart ag duine:

- A bheith ar an eolas faoi na sonraí atá á gcoinneáil ag an scoil fúthu
- Iarratas rochtana a dhéanamh ar *aon* sonraí atá á gcoinneáil ag an Rialaitheoir Sonraí fúthu
- Cosc a chur ar phróiseáil a gcuid sonraí do chúiseanna na margaíochta díri
- Iarratas a dhéanamh sonraí míchruinne a chur ina gceart
- Iarratas a dhéanamh sonraí a léirsciosadh nuair nach bhfuil siad riachtanach ná ábhartha thuilleadh.

Próiseálaithe Sonraí

Má dhéanann an scoil sonraí a sheachfhoinsiú chuig Próiseálaithe Sonraí seachtracha, tá ceanglas dlí orthu conradh scríofa a bheith acu. (*Comhaontú Seirbhíse Scríofa Tríú Páirtí*). Sonraíonn Comhaontú Seirbhíse Scríofa Tríú Páirtí Scoil na Leanaí na coinníollacha faoinar féidir próiseáil a dhéanamh ar na sonraí, na coinníollacha slándála a bhaineann le próiseáil na sonraí agus gur gá na sonraí a léirsciosadh nó iad a fhilleadh ar an scoil ag deireadh nó críoch an chonartha.

Sárú ar Sonraí Pearsanta

Is gá don phríomhoide, thar ceann an Bhoird Bhainistíochta, aon eachtra ina gcuirtear sonraí pearsanta i mbaol a thuairisciú d'Oifig an Choimiseirí Cosanta Sonraí lasitigh de 72 uair an chloig.

Nuair is dócha go mbeidh ardphriacal ar chearta agus ar shaoirsí daoine aiceanta mar thoradh ar an sárú, caithfidh an Bord Bainistíochta an duine is ábhar do na sonraí a chur ar an eolas faoin sárú ar na sonraí pearsanta gan mhoill
Má tá Próiseálaí Sonraí ar an eolas faoi shárú ar shonraí peasannta, caithfidh sé/sí é a chur faoi bhráid an Rialaitheora Sonraí (an Bord Bainistíochta) gan mhoill.

Plé le hIarratas Rochtana ar Shonraí

Tá daoine i dteideal cóip dá sonraí pearsanta ar iarratas scríofa.
Is gá feagra a thabhairt ar an iarratas lasitigh de mhí amháin. D'fhéadfaí go mbeadh síneadh ama ag teastáil m.sh. le linn na laethanta saoire

Ní féidir aon táille a ghearradh ach amháin i gcúinsí eisceachtúla nuair atá na hiarratais atriallacht, go soiléir gan bhunús nó iomarcach.
Ní féidir aon sonraí pearsanta a sholathar a bhaineann le duine eile nach iad an duine ia ábhar do na sonraí.

SOLÁTHAR FAISNÉISE AR AN NGUTHÁN

Ba cheart d'fhostaí atá ag plé le fiosrúcháin ghutháin a bheith an-chúramach faoi fhaisnéis phearsanta atá ag an scoil a nochtadh ar an nguthán. Ba cheart don fhostaí na rudaí seo thíos a dhéanamh ach go háirithe:

- Iarr ar an duine an t-iarratas a chur i scríbhinn
- Cuir an t-iarratas ar aghaidh chuig an bpríomhoide le haghaidh cúnamh i gcásanna deacra
- Ná mothaigh go gcaithfear faisnéis phearsanta a nochtadh

SOCRUITHE DON CHUR I bhFEIDHM, RÓIL AGUS FREAGRACHTAÍ

'Sé an Bord Bainistíochta an Rialaitheoir Sonraí agu cuireann an Príomhoide an Polasaí um Chosaint Sonraí i bhfeidhm, a chinntíonn go bhfuil baill foirne, a bhíonn ag láimhseáil, nó ag rochtain ar, na *Sonraí Pearsanta*, ar an eolas faoina bhfreagrachtaí um Chosaint Sonraí

Tá na daoine seo a leanas feagrach as cur i bhfeidhm an Pholasaí seo um Chosaint Sonraí:

Ainm

Bord Bainistíochta: Muireann Mhic Dhonncha
Príomhoide: Olive Cróc

Freagracht

Riaraitheoir na Sonraí
Cur i bhfeidhm an Pholasaí

FAOMHADH AGUS CUMARSÁID

Faofa ag an mBord Bainistíochta ar 05 Aibreán 2025 agus sínithe ag an gCathaoirleach.
Tá an faomhadh taifeadta ag an Rúnaí i Miontuairiscí an chuinnithe.

MONATÓIREACHT AR CHUR I bhFEIDHM AN PHOLASAÍ

Déanfaidh an Príomhoide, an Fhoireann agus an Bord Bainistíochta monatóireacht ar chur i bhfeidhm an pholasaí seo. Déanfar athbhreithniú air nuair is gá tar éis don Phríomhoide tuarascáil a dhéanamh air agus tar éis glacadh le moltaí dleathacha agus dea-chleachtas reatha curtha san áireamh.

ATHBHREITHNIÚ AGUS MEASÚNÚ AR AN bPOLASAÍ

Déanfar athbheithniú agus measúnú ar an bpolasaí seo tar éis dhá bhliain. Agus an t-athbheithniú agus an measúnú leanúnach ar siúl, tabharfar suntas don eolas agus do na treoirínte is nuaí (m.sh. ón gCoimisinéir Cosanta Sonraí, ón Roinn Oideachais agus Scileanna nó ó TÚSLA), don reachtaíocht agus don aiseolas ó thuismitheoirí/chaomhnóirí, ó dhaltáí, ó bhaill foirne na scoile agus ó dhaoine eile. Déanfar an polasaí seo a leasú más gá i gcomhthéacs an athbheithnithe agus an mheasúnaithe agus lasitigh den chreat pleanála scoile.

Sínithe: 
Thar ceann an Bhoird Bhainistíochta

Dáta faofa: XXXXXXXXXXXXXXXXXXXX

05 04 2025

INTRODUCTORY STATEMENT

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 Protection Regulation (GDPR)

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 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

Scoil na Leanaí 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:

5. be able to provide access to individuals to their data;
6. ensure it is held securely;
7. document our data protection procedures; and
8. 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. Scoil na Leanaí 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. 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 encrypted and 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 will 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*. 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 natural person i.e. 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 (BoM)

Data Controller is the Board of Management of the school

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.

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 the alleged commission of an 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 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. Scoil na Leanaí sends, by post, a copy of a child's *Passport*, as provided by the National Council for Curriculum and Assessment, to the Principal of the Post-Primary School in which the pupil has been enrolled.

Where reports on pupils which have been completed by professionals, apart from Scoil na Leanaí 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 of the 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 2014** 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, (with the exception of schools under the direction of Education and Training Boards), 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 by that body 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 Act 2015**, *mandated persons* in schools 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).

RELATIONSHIP TO CHARACTERISTIC SPIRIT OF THE SCHOOL:

Scoil na Leanaí seeks to:

- enable students 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. The school wishes to achieve these aims/missions while fully respecting individuals’ rights to privacy and rights under the Data Protection legislation.

PERSONAL DATA

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

1. Staff records:

d. 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.
- Name and contact details of next-of-kin in case of emergency.
- 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 Children First Act 2015

e. *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)
- 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.

f. *Location and Security procedures of Scoil na Leanaí*

- a. 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.
- b. Digital records are stored on password-protected computers in a locked office. In exceptional cases these laptops may be taken home by teachers, these computers will not leave the house during this time.

2. Student records:

d. *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 notable 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 that staff 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.

e. 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 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, e.g. 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 Photography Policy' and 'School Website Privacy Statement'.
- to ensure that the student meets the school's admission criteria
- to ensure that students meet the minimum age requirement 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, 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 second-level educational institutions.

f. (Location and Security procedures as above):

3. Board of Management records:

d. Categories of Board of Management data:

- 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 individuals.

e. 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.

f. (Location and Security procedures as above):

4. Other Records: Creditors

b. Categories of Board of Management 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

c. Purposes: The purposes for keeping creditor records are:

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.

d. (Location and Security procedures as above):

5. Other Records: Charity Tax-back Forms

b. Categories of Board of Management 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.

c. Purposes: The purposes for keeping creditor records are:

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 donor's name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the school in the event of audit by the Revenue Commissioners.

d. (Location and Security procedures as above):

CCTV IMAGES/RECORDINGS-

CCTV is installed in Scoil na Leanaí - cameras are installed externally covering;

- 1 internal camera inside the front door.
- The yard in front of the school,
- The area in front of the shelter.
- Behind the shelter
- The corner of the basketball court.
- The Green area beside the school.
-

These CCTV systems may record images of staff, students and members of the public who visit the premises. The viewing station is in the principal's office,

Purposes:

Safety and security of staff, students and visitors and to safeguard school property and equipment.

Security:

Access to images/recordings is restricted to the Principal and Deputy Principal of the school. Recordings are retained for 28 days, except if required for the investigation of an incident. Images/recordings may be viewed or made available to An Garda Síochána pursuant to Data Protection Acts legislation.

EXAMINATION RESULTS

The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual and continuous assessment results and the results of Standardised Tests.

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 guardian about educational attainment levels and recommendations for the future. 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 other schools to which pupils move.

Location and Security procedures

In locked Store room

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:

- 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
- Special Educational Needs Policy
- Critical Incident Policy
- Attendance Policy

PROCESSING IN LINE WITH A DATA SUBJECT'S RIGHTS

Data in Scoil na Leanaí 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.

Data Processors

Where the school outsources to a data processor off-site, it is required by law to have a written contract in place (*Written Third party service agreement*). The security conditions attaching to the processing of the data and that the data must be deleted or returned upon completion or termination of the contract.

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 by the principal, on behalf of the BoM.

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.

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

Name	Responsibility
Board of Management: Muireann Mhic Dhonncha	Data Controller
Principal: Olive Cr�c	Implementation of Policy

RATIFICATION & COMMUNICATION

Ratified at the BoM meeting on 05 April 2025 and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting.

MONITORING THE IMPLEMENTATION OF THE POLICY

The implementation of the policy shall be monitored by the Principal, staff and the Board of Management. It will be reviewed annually following a report from the Principal as to its implementation and taking regard to legal recommendations and current best practice.

REVIEWING AND EVALUATING THE POLICY

The policy will be reviewed and evaluated after 2 years. 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 review and evaluation and within the framework of school planning

Signed:
For and on behalf of Board of Management

Date: Ratified