


<p align="center">Polasaí um Chosaint agus um Choimeád Taifead ar Shonraí Gaelcholáiste Phort Láirge</p>	<p>Data Protection and Record Retention Policy</p> 
<p>Réamh Ráiteas agus Réasúnaíocht Is iad foireann GCPL maraon leis an mBord Bainistíochta a chuir an polasaí seo le chéile. Baineann an polasaí seo le conas mar a déantar sonraí pearsanta do dhaltaí, do bhaill foirne agus d'éinne eile lena ndéanann an scoil gnó (m.sh. tuismitheoirí, baill ón mBord Bainistíochta srl.) a choimeád agus conas mar a déantar na sonraí seo a chosaint. Déanann an Polasaí seo plé ar choimeád agus ar chosaint sonraí atá cláraithe ar pháipéar agus atá cláraithe ar an ríomhaire.</p> <p>Scóip Sonraí: Ciallaíonn sin faisnéis i bhfoirm inar féidir í a phróiseáil. Áirítear ann sonraí uathobrithe (faisnéis ar ríomhaire nó faisnéis a taifeadadh chun í a chur ar ríomhaire ar ball) agus lámh sonraí (faisnéis a choimeádtar mar chuid de chóras comhaid ábhartha nó le hintinn a bheith ina chuid de chóras comhaid ábhartha).</p> <p>Córas Comhaid Ábhartha: - Ciallaíonn sé seo aon tacar d'fhaisnéis, bíodh is nach bhfuil sé ríomhairithe, atá struchtúrtha trí thagairt do dhaoine aonair, nó trí thagairt do chritéir i dtaobh daoine aonair, i dtreo is gur furasta rochtain ar fhaisnéis shonrach i dtaobh daoine aonair ar leith.</p> <p>Sonraí Pearsanta: - Ciallaíonn sé seo sonraí a bhaineann le duine aonair gur féidir é/í a aithint ó na sonraí nó ó na sonraí i dteannta faisnéise eile atá i seilbh an rialaitheora sonraí.</p> <p>Rialaitheoir Sonraí: - Ciallaíonn sé seo duine aonair nó aonán dlí a rialaíonn inneachair agus úsáid sonraí pearsanta. Is féidir an scoil a mheas ina rialaitheoir sonraí, an príomhoide ag feidhmiú ar son an Bhoird Bhainistíochta chun na feidhmeanna i gceist a chomhlíonadh.</p> <p>Aithníonn agus glacann an scoil lena cuid freagrachtaí maidir leis na nithe seo a leanas:</p> <ul style="list-style-type: none"> • An tAcht um Chosaint Sonraí 1998 agus An tAcht um Chosaint Sonraí (Leasú) 2003. • An tAcht Oideachais 1998, alt 9 (g) a chuireann scoil faoi dhualgas taifead a chur ar fáil do thuismitheoirí agus d'iar dhaltaí os cionn ocht mbliana déag d'aois. 	<p>Introduction and Rationale This policy – Data Protection and Record Retention Policy - was formulated by the staff and Board of Management of GCPL .This policy deals with how personal data of pupils, staff members and other partners with whom the school deals with (for example, parents, members of the Board of Management etc.) is stored and protected. This policy deals with data which is both stored on paper and on computers.</p> <p>Scope Data: What is meant by data is information in a form that can be processed. For the purposes of this policy, it includes automated data (information on computer or information recorded with the intention of putting it on a computer) and manual data (information that is kept as part of a relevant filing system or with the intention that it should form part of a filing system).</p> <p>Relevant Filing System: This refers to any set of information that, while not computerised, is structured by reference to pupils, staff or partners with whom the school has business, so that specific information relating to a particular individual is readily accessible.</p> <p>Personal Data: This refers to data belonging to an individual who is identifiable by this data or from any other personal data that is in possession of the data controller.</p> <p>Data Controller: A data controller is the individual or staff which controls the contents and use of personal data. The school itself can be considered the data controller, with the principal acting on behalf of the Board of Management in exercising the functions involved.</p> <p>The school recognises and accepts its responsibility as set out in the following:</p> <ul style="list-style-type: none"> • Data Protection Act 1998 and Data Protection (Amendment) Act 2003. • Education Act 1998, section 9 (g), requiring a school to provide access to records to parents and to past pupils over 18.

• An tAcht Oideachais 1988, alt 22.2 (b), a chuireann dualgas ar scoil measúnú rialta a dhéanamh ar dhaltaí agus na torthaí sin a chur ar fáil do dhaltaí agus dá dtuismitheoirí go tréimhsiúil.

• An tAcht Oideachais (Leas) 2000, a chuireann dualgas ar scoileanna tinreamh scoile agus aistriú dhaltaí a thuairisciú.

Déanfaidh GCPL mar Rialaitheoirí Sonraí, gach iarracht réasúnta a freagrachtaí a chomhlíonadh agus dea-chleachtas i láimhseáil agus úsáid eolais pearsanta a chur chun cinn.

Cloifidh an scoil, go háirithe, leis na prionsabail Cosaint Sonraí mar atá leagtha síos sna hAchtanna Cosaint Sonraí.

Sonraíonn na prionsabail seo go mbeidh sonraí:

- Próisithe go cothrom agus go dleathach.
- Próisithe d'fheidhmeanna teoranta.
- Úsáidte agus nochtaithe i mbealaigh atá comhoiriúnach leis na feidhmeanna seo.
- Leormhaith, ábhartha, gan a bheith iomarcach.
- Beacht agus suas chun dáta nuair is gá. Gan a bheith coinnithe níos faide ná mar is gá.
- Próisithe de réir chearta an ábhair sonraí.
- Coinnithe go daingean agus faoi ghlas: - Tá an córas seo a leanas i bhfeidhim ionas é seo a chinntiú:
 - Coimeádfar comhaid phearsanta i gcaibinéad le glas air in oifig a mbíonn faoi ghlas.
 - Ní fhágfar aon sonraí pearsanta dalta, foireann nó tuismitheoirí/ caomhnóirí ar bhinse thar oíche.
 - Tá pasfhocal logáil isteach ar gach ríomhaire múinteora a choimeádtar faoi rún.
 - Úsáideann an foireann pasfhocail pearsanta le logáil isteach ar chóras monatóireachta na ndaltaí VsWare agus logáileann siad amach nuair atá siad as an rang.
 - Úsáideann foireann riaracháin/ bainistíochta na scoile pasfhocal pearsanta rúnda le logáil isteach i gcóras OLCS.
- Caithfidh an Rialaitheoir Sonraí cóip de shonraí pearsanta duine a thabhairt dó/di má lorgaíonn sé/sí é.

Gaol le Spiorad Sainiúil na Scoile

Aithníonn GCPL cearta chun príobháideachta phobail na scoile ar fad.

Aidhmeanna an Pholasaí

- Cinntiú go bhfuil an scoil ag cloí lena dualgais dleathacha.
- Cearta agus príobháideacht daoine atá mar ábhair sonraithe a thagann isteach sa scoil a chosaint. (Baill foirne, Daltaí, Riaracháin, Bord Bainistíochta)
- Saghais tuairiscí a choimeádtar agus na modhanna a

• Education Act 1998, section 22.2 (b), requiring a school to regularly evaluate students and periodically report the results of the evaluation to the students and their parents.

• Education Welfare Act 2000, requiring a school to report school attendance and transfer of pupils.

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

These principles state that data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Used and disclosed only in ways compatible with these purposes
- Adequate, relevant and not excessive.
- Accurate
- Kept no longer than necessary.
- Processed in accordance with data subjects rights.
- Kept in a safe and secure place – The following systems are in place to ensure this:
 - All personal files are kept in a locked filing cabinet or in a lockable office.
 - no personal details of staff, students or parents/guardians are to be left on desks overnight.
 - Each teacher has a private personal login password for their class computer.
 - Each teacher has a private login password for the students' monitoring system, VsWare, which they log out of when not in the room.
 - Management and administrative staff use a personal private login to access the OLCS system.

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

Relationship to the Characteristic Spirit of the School

GCPL respects the rights of privacy of all those in the whole school community.

Aims of the Policy

- To ensure that the school complies with its legislative obligation.
- To protect the rights and privacy of all those who are the subjects of data that comes into the possession of the school. (Personnel, Pupils, Administration, Board of Management)
- To clarify the types of records maintained and

bhaineann le hiad a chur ar fáil do ghrúpaí ábhartha-tuismitheoirí agus iar-dhaltaí os cionn ocht mbliana déag d'aois san áireamh - a shoiléiriú.

Inneachar an Pholasaí

Roinntear an Polasaí seo i ndhá chuid mar seo a leanas:

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

B. Eolas ar na socrúcháin i bhfeidhm le cinntiú comhlíonadh dualgas maidir le liosta na nocht rialacha cosanta sonraí.

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

Tagann na sonraí faoi chúram an (na) Rialaitheoir(i)

Sonraí faoi na teidil seo a leanas:

1. Sonraí Pearsanta Íogair

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

2. Sonraí Pearsanta

- **Sonraí Daltaí** - Baineann na sonraí seo le sonraí pearsanta na ndaltaí ar nós ainm, seoladh, dáta breithe, inscne, eolas cothaithe, USPS, Tuairiscí scoile.

Taifead na nDaltaí

- Torthaí scrúdaithe deartha ag múinteoirí
- Torthaí scrúdaithe caighdeánacha.
- Cóip de POA (Plean Oideachais Aonair do dhaltaí le riachtanais speisialta oideachais).
- Plean Iompair agus Pleananna tacaíochta ranga (nuair is gá).
- Tuairiscí rúnda.
- Comhfhreagras ó thuismitheoirí.
- Cóipeanna de hOrdú Cúirte maidir le rochtain.
- Tuairisc dheireadh na bliana.
- Faomhadh acmhainní ón NCSE.
- Taifead de mhí-iompar tútach uafásach.
- Taifead de chruinnithe idir tuismitheoirí agus an Príomhoide.
- Foirmeacha indeimnithe leighis.
- Litreacha aistriúcháin.
- Cóipeanna de chomhfhreagras a seoladh ag gníomhaireachtaí seachtracha

Sonraí Riaracháin

- Leabhar tuairisc eachtraí.
- Dialanna tuairisc clóis (taifead d'eachtraí sa chlós).
- Leabhair rollaí, tinrimh agus clár leabhair.

the procedures relating to making them available to the relevant bodies, including parents and past-pupils over 18.

Key Measures (Content of Policy)

This policy is divided into two sections as follows:

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

B. Details of the arrangements in place to ensure compliance with the eight rules of data protection.

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

Manual and computer records are kept .

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

1. Sensitive Personal Data

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

2 Personal Data

- **Student Data** -This data relates to personal details of the students such as name, address, date of birth, gender, dietary information, PPSN, school reports.

Pupil Records

- Results of teacher designed tests
- Standardised tests results
- Copy of IEP (Individual Education Plan for pupils with Special education Needs)
- Behaviour plan and classroom support plans (where necessary)
- Confidential reports
- Correspondence from parents
- Copy of court orders re access
- Copy of end of year report
- Approval of resources from NCSE
- Records of breaches of serious or gross misbehaviour
- Records of meetings between Principal and parents
- Administration of medicine indemnity form
- Letters of transfer
- Copies of correspondence that have been sent to external agencies.

Administrative Data

- Incident Report Book
- Yard diaries (record of incidents on the yard)

Is í aidhm an coimeád sonraí seo ná cinntiú go bhfuil an scoil ag cloí le riachtanais riaracháin agus reachtaíochta, cinntiú gur féidir le daltaí incháilithe leas a bhaint as tacaíochtaí breise foghlamtha nó airgeadais, ionas gur féidir teagmháil le tuistí nuair is gá, ionas cabhrú le gach dalta barr feabhais cumais a bhaint amach.

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

Is í aidhm an coimeád sonraí seo ná cinntiú go bhfuil an scoil ag cloí le riachtanais riaracháin agus reachtaíochta, ionas íocaíochtaí a éascú, pinsean a éascú sa todhchaí agus chun taifead a choimeád ar ardú céime.

- **Sonraí Thuismitheora/Chaomhnóra** - Sonraí ar nós eolas ar fhoirm clárúcháin dhalta agus íocaíochta déanta leis an scoil.

Is í aidhm an coimeád sonraí seo ná ionas go mbeidh an scoil in ann teagmháil a dhéanamh le tuismitheoirí/caomhnóirí nuair is gá.

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

An Bord Bainistíochta

- Cláraíonn fillteán miontuairiscí cruinnithe Boird cinntí an Bhoird agus é i mbun a dhualgas reachtúil. I measc páipéarachas san fhilleán tá:

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

Is í aidhm coimeád na sonraí seo ná ionas taifead a choimeád ar chruinnithe Boird, na cinntí a ghlacadh srl.

Nochtadh Taifid

Ní scaoiltear aon sonraí don 3ú páirtí gan chead curtha in iúl ag na páirtithe i gceist.

- Roll books and registers

The purpose for keeping student records are to comply with legislative and administrative requirements, to ensure that eligible students can benefit from the relevant additional teaching or financial supports, to enable parent/guardians to be contacted, to enable each student to develop his/her full potential.

- **Staff Data** - This includes names, addresses, PPSN, contact details, payroll number, CVs, attendance records and copies of application and employment contracts, records of Garda vetting, bank account details.

The purpose for keeping staff records includes compliance with administrative and legislative requirements, to facilitate the payment of staff, to facilitate pension payments in the future and to keep a record of promotions made.

- **Parent/Guardian Data** - This includes details listed on a pupil's enrolment form and payments made to the school.

The purpose for keeping these records is in order for the school to be able to contact the parents/guardians when the need arises.

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

Board of Management

- The minutes folder of The Board of Management records the decisions reached by the Board in the discharge of its statutory duty. The minute folder also includes:
- Correspondence of a non routine nature received and discussed by The Board
- Copies of the Financial reports presented to the Board
- Copies of the Principal's reports presented to the Board.
- Any other documentation that the Board, in its absolute discretion, deems appropriate to be included in the minute folder.
- Complaints presented to the Board and all subsequent correspondence
- Payroll Data
- Financial Data

The purpose for keeping records is to keep a record of Board appointments, decisions made by the board etc.

Disclosure of Records

No details may be forwarded to any third party without the express permission of the parties concerned.

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

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

Lorgófar cead ó thuistí sula scaoiltear aon eolas le gníomhaireachtaí seachtracha. Caithfidh gníomhaireachtaí seachtracha nochtadh sonraí a lorg i scríbhinn. Caithfidh tuismitheoirí/caomhnóirí iarratais a dhéanamh chuig an Rialaitheoir sonraí i scríbhinn chomh maith.

Ag freagairt d'íarratais

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

B. Comhlíonadh Dualgas maidir le Liosta na nOcht Rialacha Cosanta Sonraí

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

Treoirínte ar Am coinneála do Shonraí

Coinneofar sonraí fad is atá daltaí ag freastal ar an scoil/ ball foirne fostaithe sa scoil agus ar feadh tréimhse breise idir 1 agus 8 mbliana. I gcásanna áirithe, d'fhéadfai roinnt sonraí a choinneáil níos faide ná seo.

Sonraí Pearsanta agus Taifead ar Dhaltaí

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

- Tuairiscí scoile deireadh na bliana, gach bliain
- Torthaí scrúdaithe caighdeánacha ó gach bliain sa scoil
- Cóipeanna de na tuairiscí proifisiúnta is déanaí ó ghníomhaireachtaí seachtracha
- Cóipeanna de Phleananna Oideachais Aonair
- **Coinneofar tuairiscí coinnithe ag an bPríomhoide maidir le cosaint leanaí/ ar leas leanaí ar feadh am éiginnte.**

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

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

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

Outside agencies requesting disclosure of data Must do so in writing. Parents/ Guardians must also make such a request in writing to the Data Controller.

Responding to requests

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

B. Compliance Regarding the List of the Eight Rules of Data Protection

1. Obtain and process information fairly.
2. Keep it only for one or more specified, explicit and lawful purposes.
3. Use and disclose it only in ways compatible with these purposes.
4. Keep it safe and secure.
5. Keep it accurate, complete and up to date.
6. Ensure that it is adequate, relevant and not excessive.
7. Retain it for no longer than is necessary for the purpose or purposes.
8. Give a copy of his/her personal data to that individual on request.

Guidelines on Retention Time for Data

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

Personal Data and Pupil Records

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

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

Am Coinneála do Shonraí Riaracháin

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

Am Coinneála do Shonraí an Bhoird Bainistíochta

Coinneofar fillteán miontuairiscí na gcruinnithe Boird go deo.

Stóráil

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

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

Dáta Cur i bhFeidhm

Tá an polasaí seo i bhfeidhm ó Nollaig 2015. Bogfar aon sonraí atá le bheith stóráilte go fadtréimhseach go suíomh daingean. As sin amach, scriosfar aon sonraí atá stóráilte os cionn 8 mbliana, agus cuirfear aon sonraí ábhartha fadtréimhseacha ón scoil bhliain roimhe sin i stórais.

Retention time for Administrative Data

- Yard book, Incident Report Book and record sheets of fire drills will be kept for 8 years
- Staff records will be retained for 1 year following their departure and then will be shredded.
- Records in relation to staff welfare will be held for 8 years
- Records for employees of the Board of Management will be retained for 8 years
- Applications/CVS submitted for work experience will be shredded at end of current year
- **Roll books will be kept forever**

Retention time for Board of Management Data

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

Storage

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

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

Implementation Date

This policy is effective from December 2015. All data that is designated for long term storage will be transferred to a secure location. Thereafter, at the commencement of each new school year, data that is in excess of 8 years will be destroyed and the relevant long term storage data from the previous school year will be placed in storage.

Glactha agus faofa ag an mBord Bainistíochta ar an:

Síniú an Chathaoirligh: _____

Síniú an Phríomhoide: _____

Accepted and approved by the Board of management on the