



Polasaí Chosaint Sonraí *Data Protection Policy*

Réamhrá *Introduction*

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

Cheap Foireann agus Bord Bainistíochta Gaelscoil Chaladh an Treoigh an beartas d'fhonn na taifid is gá a choimeád a shainaitheint agus d'fhonn rúndacht agus nósanna imeachta soláimhsithe a chinntiú.

Baineann na nósanna imeachta leis an rochtain a bhíonn ag tuismitheoirí, daltaí agus páirtithe leasmhara ar dhoiciméid den chineál sin agus le stóráil shábháilte na sonraí. Thug David Ruddy ón gcomhlacht Mason Hayes Curran tacaíocht chun an polasaí a chur le chéile trí athbhreithniú a dhéanamh ar na doiciméid ina measc an polasaí, na ceithre aguisín agus rinne sé seimineár leis an bpríomhoide agus an rúnaí ar 29 Aibreán 2021. Cuireadh an polasaí chuig cuntasóirí na scoile L.V. Hogan agus an comhlacht T.F.C. ata fostaithe ag an scoil Infinity IT chun a chinntiú go bhfuil a gcleachtas ag teacht leis an bpolasaí. Cuireadh cóip den polasaí chuig an Patrún, an Foras Patrúnachta freisin.

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

This policy was formulated by Staff and Board of Management of Gaelscoil Chaladh an Treoigh to identify the records required to be retained by the school to achieve this and to ensure confidentiality and manageable procedures in relation to access to such records by parents, pupils and stake holders and the safe storage of such data. David Ruddy from Law firm Mason Hayes Curran provided support in the formation of this policy by way of review and approval of the policy, it's four appendices and a one-to-one seminar with the principal and secretary on recommendations and guidance on 29 April 2021. The draft policy was also sent to school accountants L.V. Hogan and school IT consultants Infinity IT to ensure that their practice was in line with the policy. The policy was also sent to the Patron, An Foras Pátrúnachta.

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

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

Réasúnaíocht *Rationale*

- Riachtanas is ea beartas um chosaint sonraí agus choimeád taifead chun a chinntiú go bhfuil nósanna imeachta oiriúnacha curtha i bhfeidhm ag an scoil maidir le freagracht agus trédhearcacht;
- Is nós maith é taifead a choimeád ar dhul chun cinn dalta ar mhaithe le riachtanais fhoghlama a shainaitheint;
- Caithfear beartas a chur i bhfeidhm chun a chinntiú go gcomhlíonann Gaelscoil Chaladh an Treigh an reachtaíocht chomh maith le h-imlitreacha na roinne, mar shampla;
 - An tAcht Oideachais, Alt 9(g) a éilíonn go dtabharfaidh scoil rochtain ar thaifid do dhaltaí thar 18 mbliana d'aois agus a dtuismitheoirí;
 - An tAcht Oideachais (Leas) 2000 - lena n-áirítear forálacha a éilíonn go gcuirfidh scoil tuairisciú ar fáil maidir le tinreamh, le haistriú daltaí go scoileanna eile agus le cumarsáid leis an Oifigeach Leasa Oideachais;
 - An tAcht um Chosaint Sonraí 1998 agus an tAcht um Chosaint Sonraí (Leasú) 2003;
 - Imlitir 0056/2011 - maidir le cur i bhfeidhm Straitéis Litearthachta agus Uimhearthachta Náisiúnta a bhaineann le Measúnú;
 - Imlitir 0024/2013 - maidir le córas na n-éileamh ar líne i mbunscoileanna aitheanta.
 - 0025/2015 - Príomhbhunachar Sonraí ar Líne
 - (RCGS) Cosaint Sonraí 25ú Bealtaine 2018
- *A policy on data protection and record keeping is necessary to ensure that the school has proper procedures in place in relation to accountability and transparency;*
- *It is good practice to record pupil progress so as to identify learning needs;*
- *A policy must be put in place to ensure a school complies with legislation and departmental circulars such as;*
 - *Education Act, Section 9(g) requiring a school to provide access to records to students over 18 and their parents;*
 - *Education Welfare Act 2000 – including provisions requiring a school to report school attendance, the transfer of pupils to other schools and communications with the Education Welfare Officer;*
 - *Data Protection Act 1998 and the Data Protection (Amendment) Act 2003;*
 - *Circular Letter 0056/2011 -regarding the implementation of the National Literacy and Numeracy Strategy regarding Assessment;*
 - *Circular Letter 0024/2013 -regarding the online claims system in recognized primary schools.*
 - *0025/2015 Primary Online Database (POD).*

- o *General Data Protection Regulation May 2018 (GDPR)*

Aidhmeanna & Cuspóirí *Aims & Objectives*

- Tuiscint a shoiléiriú - i gcomhairle leis an bhfoireann, leis na tuismitheoirí agus leis an mbainistíocht - ar na cineálacha taifead dalta a choimeádtar agus conas is féidir na taifid seo a chur ar fáil.
- Chun a chinntiú go gcomhlíonann Gaelscoil Chaladh an Treoigh na riachtanais reachtaíochta maidir le teidlíochtaí na ndaltaí, na foirne agus bhaill eile chomhphobal na scoile ar chosaint sonraí.
- Taifid chuí maidir le dul chun cinn oideachasúil na ndaltaí a chur ar bun, rud a fhágann go mbeidh tuismitheoirí agus na baill foirne ábalta cuidiú le foghlaim an pháiste ar bhealach fiúntach agus éifeachtach; agus a chinntiú go mbainfidh daltaí leas as múinteoireacht bhreise chuí agus as tacaíocht airgeadais.
- Tuairiscí ar dhul chun cinn oideachasúil an pháiste a thabhairt do na tuismitheoirí ar bhealach bríoch.
- Treoirlínte follasacha a bhunú ar conas na taifid sin a chur ar fáil do thuismitheoirí, do pháirtithe leasmhara agus d'iardhaltaí (os cionn 18 mbliana d'aois).
- Coinníollacha a leagan amach maidir leis an achar ama a gcoimeádfar na taifid agus na tuairiscí agus an modh ina gcoimeádfar iad.

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

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

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.

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

Scóip Scope

Sonraí	Ciallaíonn sin faisnéis i bhfoirm inar féidir í a phróiseáil. Áirítear ann sonraí uathoibríthe (faisnéis ar ríomhaire nó faisnéis a taifeadadh chun í a chur ar ríomhaire ar ball) agus lámhshonraí (faisnéis a choimeádtar mar chuid de chóras comhaid ábhartha nó le hintinn a bheith ina chuid de chóras comhaid ábhartha).
Córas Comhaid Ábhartha	Ciallaíonn sé seo aon tacar d'fhaisnéis, bíodh is nach bhfuil sé ríomhairithe, atá struchtúrtha trí thagairt do dhaoine aonair, nó trí thagairt do chritéir i dtaobh daoine aonair, i dtreo is gur furasta rochtain ar fhaisnéis shonrach i dtaobh daoine aonair ar leith.
Sonraí Pearsanta	Ciallaíonn sé seo sonraí a bhaineann le duine aonair gur féidir é/í a aithint ó na sonraí nó ó na sonraí i dteannta faisnéise eile atá i seilbh an Oifigigh Cosanta Sonraí.
<i>Data</i>	<i>What is meant by data is information collected in a form that can be processed. For the purposes of this policy, it includes automated data (information on computer or information recorded with the intention of putting it on a computer) and manual data (information that is kept as part of a relevant filing system or with the intention that it should form part of a filing system).</i>

Relevant Filing System

This refers to any set of information that, while not computerised, is structured by reference to individuals with whom the school has business, so that specific information relating to a particular individual is readily accessible

Personal Data

This refers to data belonging to an individual who is identifiable by this data or from any other personal data that is in possession of the Data Protection Officer.

Treoirlínte *Guidelines*

Is é an Bord Rialaitheoir Cosaint Sonraí.

(i) Sonraí Pearsanta:

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

Tá taifead leighis coiméadta i bhfillteán le cead Dáilte Leighis, i gcaibinéid faoi ghlas ag an té atá i gceannas ar Shlándáil agus Sábháilteacht.

Tá na leathanaigh ón bhfeitheoireacht coiméadaithe ag múinteoirí ranga i bhfillteáin dhoiléir ina tarraicáin faoi ghlas nuair atá siad comhlánaithe. Tugtar iad don rúnaí ag deireadh na bliana chun iad a chur i stóras.

Tá tuairiscí /measúnaithe coiméadaithe i gcaibinéid comhad faoi ghlas in Oifig an Chomhordaitheoir Oideachais Speisialta.

Tá taifid faoi iar-scoláirí coméadta sa Chartlann, a bhíonn i gcónaí faoi ghlas.

Coimeádtar na taifid sin i bhfoirm páipéir i gcófra faoi ghlas in oifig an rúnaí, i bhfoirm leictreonach ar ríomhaire scoile atá faoi chosaint ag pasfhocal agus ar bunachar sonraí/scarbhileoga scoile, lena n-áirítear Aladdin. Tá fáil ag an bPríomhoide, ag an Rúnaí agus ag an gCathaoirleach orthu mäs gá.

(ii) Taifid na nDaltaí

Féach – Agúisín 2 le haghaidh miondealú iomlán

Coimeádtar gach múinteoir ranga taifid na ndaltaí i gcaibinéad faoi ghlas. Úsáidtear córas leictreonach Aladdin sa scoil i láthair na huaire. Tá bunchóip doiciméad siceolaíochta/cliniciúil/OT/S&L á gcoimeád i seomra an Chomhordaitheora Oideachais Speisialta. Chomh maith leis sin, baintear úsáid as bunachar sonraí scoile ríomhairithe.

(iii) Sonraí Ball Foirne:

Baineann na sonraí seo le heolas pearsanta agus gairmiúil na mball foirne, mar shampla, ainm, seoladh, dáta breithe, sonraí teagmhála, uimhir phárolla, taifid tinrimh, cáilíochtaí,

taifid scoile, saoire bhreiteachta, Teastais ón gComhairle Múinteoireachta, Teastais Ghrinnfhiosrúcháin, Forbairt Ghairmiúil Leanúnach, CVanna, tuairisceáin scoile, ranganna a múineadh agus sinsearach.

Coimeádtar na taifid seo i gcófra faoi ghlas in oifig an Príomhoide agus tá fáil ag an gCathaoirleach agus ag an bPríomhoide orthu. Tá fáil ar eolas bunúsach in oifig an rúnaí agus tá fáil ar an t-eolas seo ag an rúnaí, ag an bPríomhoide agus ag an gCathaoirleach.

(iv) Sonraí

Riaracháin: Is éard atá sna sonraí seo:

- Leathanaigh feitheoireachta – Cuir an eachtra tromchúiseach ar Aladdin. Coiméad na leathanaigh san fhilleán i dtarraicán faoi ghlas sa seomra ranga nuair atá siad comhlánaithe agus tabhair don rúnaí iad ag deireadh na bliana.
- Foirme Slánaíochta um Dháileadh Leighis
- Polasaithe
- Comhaid FSS, Tusla, Gardaí, Aladdin, Roinn Oideachas,
- Cuntais
- Tuairiscí Tinrimh

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

(v) Comhaid an Bhoird Bhainistíochta:

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

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

Bíonn líon taifead coiméadta in oifig an rúnaí. Coimeádtar an Príomhoide na taifid i bhfoirm páipéir agus tá siad ar fáil i bhfoirm leictreonach ar ríomhaire an Phríomhoide agus tá fáil ag an gCathaoirleach, agus ag an gCisteoir más gá, orthu.

(vi) Polasaí Ghrinnfhiosrúcháin na nGardaí

Mar chuid de pholasaí Ghrinnfhiosrúcháin na nGardaí, déantar grinnfhiosrúcháin ar thuistí/dhaoine, a mbeadh teagmháil acu le páistí scoile agus iad ag tacú leis an scoil i ról éagsúla, trí Phátrún na scoile. Tá an t-eolas a bhailítear príobháideach agus rúnda agus is é an príomhoide agus duine ainmnithe ón mBord Bainistíochta (an Cathaoirleach) a fheiceann an teolas a thagann ar ais ó Phátrún na scoile. Tá an t-eolas seo á stóráil in oifig an phríomhoide.

The Board is the Data Protection Controller.

(i) Personal Data:

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

Medical records are kept in a folder with Medical Administration permission, held in a locked cabinet by the staff member in charge of Health and Safety.

Sheets from Yard Duty Supervision are held by class teachers in folders in a locked cabinet once they are filled. They are given to the secretary at the end of the year to put in storage.

All assessments/reports are kept in a locked filing cabinet/room in the office of the Special Education Co-ordinator.

Records from past pupils are kept in the Cartlann which is always locked.

These records are retained in manual form in a locked press/room in the Oifig an Rúnaí, in electronic form on school password protected computers and on school databases/spreadsheets including Aladdin. The Principal, secretary and Chairperson have access to these records.

(ii) Pupil Records

See Appendix 2 for a full breakdown

Pupil records are held by each class teacher in a locked cabinet. A computerized school database is also used. Psychological/Clinical/Occupational Therapy/Speech & Language Assessments are held in the Special Education Co-ordinator's office which is locked.

(iii) Staff Data:

This data relates to personal and professional details of the Staff such as name, address, date of birth, contact details, payroll number, attendance records, qualifications, school records, sick leave, Teaching Council Certificates, Vetting Certificates, Continuous Professional Development, curriculum vitae, school returns, classes taught and seniority.

Staff records are held in a locked cabinet in the Principal's office. The Chairperson and the Principal have access to these records. Some limited staff information is kept in the Secretary's office with access by the secretary, Principal and Chairperson.

(iv) Administrative Data:

This data includes data such as:

- *Supervision Record Sheets – update Aladdin re serious incidents. Once sheet is filled, keep in folder provided in classroom in locked drawer and give to secretary at end of year to file.*
- *Administration of Medicines Indemnity Form*
- *Policies*
- *HSE files, Tusla, Gardaí, Aladdin, Department of Education*
- *Accounts*
- *Attendance Reports*

Some of these records are retained in manual form in Oifig an Rúnaí, others in Oifig an Phríomhoide and in electronic form on the school database which is currently Aladdin.

(v) Board of Management files:

Board of Management files which may routinely include:

- *The names and contact details of each member of the Board*
- *Details of appointments to the Board;*
- *School accounts, grant payments*
- *Minutes of Board meetings*
- *Correspondence to the board which may include references to individuals*
- *Some of these records are kept in oifig an Rúnaí, some retained in the Principal's office in manual and electronic form. The Principal, Chairperson and the Treasurer have access where appropriate.*

(vi) Garda Vetting Policy

As a part of our Garda Vetting Policy, parents/persons who wish to volunteer their services to the school that may involve direct contact with school children must be vetted through the school Patron. The information that is collected and subsequently returned to the school by the Patron body is private and sensitive and can only be seen by the school Principal and another named individual on the school Board of Management (namely the Chairperson). This information is stored in the Principal's office.

Fáil ar thaifid *Access to Records*

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

- *Tuismitheoirí/caomhnóirí*
- *Iardhaltáí os cionn 18 mbliana d'aois*
- *Feidhmeannacht na Seirbhíse Sláinte (FSS)/áisíneacht sheachtrach*
- *Pearsanra scoile thuasainmnithe*
- *Roinn Oideachais*
- *Bunscoileanna agus scoileanna dara leibhéal (i gcás inarb iomchuí)*

- Comhairleoir seachtrach – i láthair na huaire Infinity IT

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

Ag Freagairt d'Iarratais

Tabharfaidh an Bord freagra d'iarratas laistigh de 30 lá den iarratas.

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

Téann an Pas Oideachasúil do dhaltaí i Rang 6 chuig an meánscoil cúí, tar éis dearbhú a fháil ón mheánscoil go bhfuil siad cláraithe ann. Ma tharlaíonn aistriú in aon bhliain eile, faightear cead i scríbhinn ón dtuismitheoir/gcaomhnóir an t-eolas seo a thabhairt don scoil nua.

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

- Parents/guardians
- Past pupils over 18
- Health Service Executive/Outside Agencies
- Designated school personnel (as specified above)
- Department of Education & Skills
- First and second-level schools (where relevant).
- External IT consultant – currently Infinity IT – Confidentiality contract
- Parents Association – through permission on enrolment form

Parental consent must be given in the event of data being transferred to outside agencies such as health professionals etc. Parents/Guardians must give such consent in writing. Outside agencies requesting access to records must do so in writing. The right to erasure or rectification of inaccurate information is available by request in writing to the data protection officer.

Responding to Requests:

The Board will respond to requests within 30 days of receipt of request.

The Annual End-of-Year School Report Form:

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

The 6th class Education passport is automatically sent to the relevant secondary school, upon receipt of confirmation that they have been enrolled there.

If a transfer takes place in any other class, consent from parents/guardians will be sought

in writing to transfer information to the new school.

Stóráil Storage

- (i) Cuirtear taifid na ndaltaí i dtaisce sa scoil go dtí go bhfuil an dalta cúig bhliain is fiche d'aois. Coimeádtar na taifid i gcomhad atá laistigh de sheomra stórais agus ar bhunachar sonraí na scoile. Féach Aguisín a 1. Tá na taifid agus na córais ríomhairithe cosanta ag pasfhocal.
- (ii) Cuirtear taifid gach ball foirne i dtaisce sa scoil de réir threoirlínte Aguisín a 1.
- (iii) Cuirtear na taifid i dtaisce de réir threoirlínte na roinne;
- (iv) Coimeádann gach múinteoir próifíl den dalta agus roinnt taifead ina s(h)eomra ranga féin agus cuirtear ar aghaidh iad chuig an gcéad mhúinteoir eile nuair a bhogann an dalta go dtí an chéad rang eile.
- (v) Déantar dramhpháipéir/asphriontaí a stialladh/a dhiúscairt go cúramach.
- (vi) Tá fáil ag pearsanra údaraithe amháin ar na taifid stóráilte.

Nóta: tá tuilleadh eolais faoi stóráil agus tréimhsí ama in Aguisín 1.

- (i) *Pupil records are stored in the school until the pupil is 25 years of age. Records are retained on the school database. Other documents/ reports are stored indefinitely in secure storage on the school premises (see Appendix 1). Access to computerized records are password protected.*
- (ii) *Staff data is stored as per Appendix 1.*
- (iii) *Other data is stored in line with departmental guidelines;*
- (iv) *A pupil profile and selection of records are held by each teacher in his/her individual classroom and passed on to the next teacher as the child moves to the next class.*
- (v) *All personal printouts are destroyed before disposal;*
- (vi) *Access to these stored files is restricted to authorized personnel only.*

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

Stórais Sonraí Leictreonach. *Electronic Data Storage*

Déanfar sonraí na scoile a óstail lasmuigh den suíomh ag comhlacht ar conradh, ar nós Aladdin Connect faoi láthair. Úsáidtear Aladdin Connect chun cead a fháil do thurais, siúlóidí, cuairteanna faoi leith srl. Slánófar méid áirithe sonraí leictreonach sa scoil. Déanfar cinnte go bhfuil an t-eolas seo sábháilte agus criptiú déanta air. Déanfar athstóráil ar eolas/sonraí chuig an gcomhlacht atá fostaithe ag an scoil. Déanfar cinnte go bhfuil criptiú déanta agus an teolas á sheoladh agus arís fad is atá sé i dtaisce.

I measc na n-ardáin oideachasúla atá in úsáid i nGaelscoil Chaladh an Treoigh tá:

- Seesaw
- Google Classroom/Gsuite
- Zoom/Meet/Teams

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

The educational platforms that are in use in Gaelscoil Chaladh an Treoigh include:

- Seesaw
- Google Classroom/Gsuite
- Zoom/Meet/Teams

Sárú Sonraí a Thuairisciú *Data Breach Reporting*

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

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

Cead Griangraif *Consent for Photographs*

Lorgaítear cead ó thuistí ar Aladdin Connect/nuair atá siad ag clárú a bpáiste sa scoil ar an tuiscint go nglacfar grianghraif dá bpáiste ag ócáidí / gníomhaíochtaí scoile agus go n-úsáidfear iad sna meáin shóisialta scoile. Is féidir aistarraingt a dhéanamh ar an gcead sin ag am ar bith ach scríobh chuig Bord Bainistíochta na scoile.

Má thógann baill foirne griangraf de pháiste(í) ar a fón féin ag imeachta scoile chun iad a ardú ar na meáin soisialta nó an suíomh scoile, ardófar an ghriangraf agus ansin scriosfar é ón bhfón taobh istigh de 24 uair. Tá ceamara scoile ar fail dóibh siúd a roghnaíonn iad a úsáid.

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

If a staff member takes a photo of a child/children on his/her phone at a school event for the purposes of putting them on social media/website, these photos are uploaded and deleted within 24 hours. There are school cameras available for those who choose to use them.

Critéir Ratha *Success Criteria*

- Comhlíonadh na nAchtanna Cosaint Sonraí agus Reacht na dTréimhsí
 - Fáil éasca ar thaifid
 - Creat curtha ar bun ar mhaithe le héascaíocht tiomsaithe agus tuairiscí a thabhairt
 - Stóráil taifead soláimhsithe
 - Córas Códanna don fhoireann ar na hinneal fotocóipeála
-
- *Compliance with Data Protection Act and Statute of Limitations Act*
 - *Easy access to records*
 - *Framework in place for ease of compilation and reporting*
 - *Manageable storage of records.*
 - *Access to photocopiers by unique pin code for all staff*

Róil & Freagrachtaí *Roles and Responsibilities*

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

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

Athbhreithniú *Review*

Déanfar athbhreithniú ar an bpolasaí seo de réir mar is gá.

This policy will be reviewed as the need arises.

Daingniú agus Cumarsáid *Ratification and Communication*

Rinneadh an polasaí seo a dhaingniú ag cruinniú Boird Bhainistíochta ar _____

Cuirfear cóip den pholasaí seo ar fáil do bhaill foirne, do Choiste na dTuistí agus do gach tuismitheoir trí shuíomh idirlín na scoile.

*This policy was ratified at a Board of Management meeting on _____
A copy of this policy will be made available to staff, the PA and each parent through the school website.*

Sínithe: _____
Cathaoirleach

Dáta: _____

Aguisín 1:

Stóráil Sábháilte agus na Tréimhsí ama gur chóir sonraí/eolas áirithe a choinneáil

Daltaí	Tréimhse Ama le Sonraí a Choinneáil
(i) Scoil Clárú / Leabhair Rollaí	Tréimhse éiginnte (retain indefinitely)
(ii) Foirmeacha iontrála	Coinnigh go dtí go bhfuil an dalta 25 mbliana d'aois
(iii) Nótaí Smachta	Ná scrios riamh
(iv) Torthaí na dTriailacha Chaighdeánaithe	Coinnigh go dtí go bhfuil an dalta 25 mbliana d'aois
(v) Measúnaithe Siceolasithe srl	Ná scrios riamh
(vi) Comhaid ROS / IEPS	Ná scrios riamh
(vii) Tuairisciú ar thimpistí	Ná scrios riamh
(viii) Caomhnú Leanaí -Taifeadadh Tuairisciú	Ná scrios riamh
(ix) Achomharc Alt. 29.	Ná scrios riamh
(x) Scrudaithe Caighdeánacha	Ná scrios riamh
(xi) Dáileadh Leighis	Coimeád go dtí go bhfuil an chéad scrúdú eile déanta ag an bpaiste, ansin faigh reidh leis an sean leabhrán Ná scrios riamh
Agallamh - Taifeadadh do baill foirne	Tréimhse Ama le Sonraí a Choinneáil

Bord Agallaimh+ Scéim Marcála + Nótaí an Bhoird Bhainistíochta (do na h-iarratasóirí nár éirigh leo)	18 mhí ón spriocdháta a bhí ann na h-iarratais a bheith istigh agus 6 mhí leis má bhíonn ar an mbinse comhionannais (Equality Tribunal) an scoil a chur ar an eolas go bhfuil éileamh ar bun.
An Fhoireann Scoile - Taifead	Tréimhse Ama le Sonraí a Choinneáil
Conradh Fostaíochta, Clárú leis an gComhairle Múinteoireachta, taifid de ghrinnfhiosrúcháin na nGardaí srl Timpiste/Gortú ar an suíomh oibre - taifead	Coinnítear ar feadh thréimhse iomlán na fostaíochta + 7 mbliana (6 bliana chun éileamh a dhéanamh i gcoinne na scoile agus bliain amháin leis chun imeachtaí a sheirbheáil ar an scoil)
Bord Bainistíochta - Taifeadadh	Tréimhse Ama le Sonraí a Choinneáil
Bord Bainistíochta: Cláir na gcruinnithe agus miontuairiscí	tréimhse éiginnte
CST (Córas Slándála Teilifíse) - Taifeadadh	Go h-iondúil, coinnítear an taifeadadh ar feadh 31 lá agus ansin glantar an taifeadadh go h-uathoibritheach. I gcás práinne Is féidir an taifeadadh a choinneáil chomh fada is a bhíonn sé riachtanach más gá.
Párolla - Cáin	Coimisinéirí loncaim - Tréimhse 6 bliana i ndiaidh dheireadh nab liana cánach.

Sonraisc/Admháil Iniúcadh ar Chuntais scoile	Coinnigh ar feadh 7 mbliana Tréimhse éiginnte

Appendix 1:

Recommendations regarding Safe storage and retention periods for different information.

PUPILS	RETENTION PERIODS
(1) School Register / Roll Books	Indefinitely
(2) Enrolment Forms	Hold until the pupil is 25 years old
(3) Disciplinary notes	Never Destroy
(4) Test Results - Standardised	Hold until the pupil is 25 years old
(5) Psychological Assessments etc	Never Destroy
(6) SEN Files /IEPS	Never Destroy
(7) Accident Reports	Never Destroy
(8) Child Protection	

Reports / Records	Never Destroy
(9) S.29 Appeals	Never Destroy
(10) Standardised Test booklets – last page	Keep until the subsequent year’s test has been completed, then shred.
(11) Medical Administration file	Never Destroy
INTERVIEW RECORDS FOR STAFF	RETENTION PERIODS
Interview Board + Marking Scheme + Board of Management notes (for unsuccessful candidates)	18 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is taken
STAFF RECORDS	RETENTION PERIODS
Contract of Employment, Teaching Council Registration, Vetting Records etc	Retention for duration of employment + 7 years
Accident / Injury at work Reports	(6 years to make a claim against the school plus 1 yr for proceedings to be served on school)
BOARD OF MANAGEMENT RECORDS	RETENTION PERIODS
BOM Agenda and Minutes	Indefinitely
CCTV Recordings	31 days normally. In event of criminal investigation – as long as is necessary
Payroll & Taxation	Revenue require a 6 year period after the end of the tax year
Invoices / receipts	Retain for 7 Years

Audited A/C's	Indefinitely

Aguisín 2 - Clár Stórala & Rochtain

Sonraí

	MR	COS	MOS	PO	R	AL	DL	C	FF
Sonraí pearsanta an dalta	ü				ü	ü			
Foirm Chlárúcháin le sonraí pearsanta íogair, cead griangraf, cead eolas a roinnt srl					ü	ü		ü	
Sonraí leighis atá íogair*						ü	ü	ü	
Cártaí tuairisce scoile	ü					ü			
Measúnuithe Síceolaíocha/Cliniciúla/Tei rípe Shaothair/Cumas Cainte agus Teanga		ü				ü			
Torthaí na dTriailacha Chaighdeánaithe	ü					ü			
Taifid Tinrimh	ü					ü			
Triail Scagtha, mar shampla, MIST agus NRIT	Ü _{fillt eán}	ü				Ü			

Trialacha ceaptha ag múinteoirí. Ceapann gach múinteoir ranga a theimpléad nó a teimpléad féin le haghaidh trialacha	ü								
Torthaí ó Thástálacha Diagnóiseacha		ü				ü			
Pleananna Oideachais Aonair	ü	ü	ü	ü		ü		ü	
Sonraí ar Thacaíocht Foghlama/Acmhainní, mar shampla, taifid de chead/diúltú fáil ar sheirbhísí Tacaíochta Foghlama/Acmhainní sa scoil		ü		ü		ü			

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Fillteáin thionscadail na ndaltaí	ü								
Eolas teaghlaigh iomchuí, mar shampla, Orduithe Cúirte a bhaineann le caomhnóireacht srl	ü			ü		Ü (gorm)			
Sonraí maidir le teagmhais iompraíochta	ü					ü		ü	
Sonraí maidir le timpistí	ü				ü			ü	
Foirm Sínithe cead a thabhairt an dalta a iompar ar thuras scoile/ griangraifeanna* a ghlacadh/ an t-idirlíon a úsáid				ü	ü	ü			

Marc oráiste -galaraithint ag an bpáiste ach níl daileadh leighis i gceist

Marc dearg - galaraithint ag an bpaiste agus daileadh leighis i gceist

Marc dubh - ní cead griangraf a thógáil/chur ar na meáin soisialta

Marc buí - tá tuairisc ar chrocadh faoi bpáiste seo ar Aladdin

Marc gorm - cúinsí íogair clainne mar sh ordú cuirte, scaradh srl

Treoir

MR	Múinteoir Ranga	PO	Oifig an Phríomhoide
COS	Co-ordaitheoir Oideachas Speisialta	R	Oifig an Rúnaí
MOS	Múinteoir Oideachas Speisialta	DL	Co-ordaitheoir dáileadh leighis
AL	Aladdin	C	Cartlann
FF	Fillteán Feitheoireachta		

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Appendix 2 – Access & Storage Matrix

Data

	CT	C SET	SET	PO	S	AL	MA	A	FF
Student's Personal Details	ü				ü	ü			
Enrolment form incl personal data, sensitive personal data, photo permission, permission to share info etc					ü	ü		ü	
Sensitive Medical Data*						ü	ü	ü	
School Report Cards	ü					ü			
<i>Psychological/Clinical/Occupational Therapy/Speech and Language Assessments</i>		ü							
<i>Standardized Test Results</i>	ü					ü			
Attendance Records	ü					ü			
<i>Screening Test such as Middle Infant Test (MIST) and National Reading Intelligence Test (NRIT)</i>	Ü folde r		ü			ü			

<i>Teacher – designed tests. Each class teacher designs his/her own test template</i>	ü								
<i>Diagnostic Tests Reports</i>	ü	ü	ü			ü			
<i>Individual Education Plans</i>	ü	ü	ü			ü			
<i>Learning Support/Resource Data such as records of permission/refusal to access Learning Support (LS)/ Resource Teaching (RT) services in the school</i>		ü		ü					
<i>Portfolios of Student Work</i>	ü								
<i>Relevant family information such as Court Orders re custody etc</i>				ü					
<i>Details of behavioral incidents</i>	ü			ü					ü
<i>Details of Accidents</i>	ü				ü				ü

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<i>Photographs*/School Tours/use of internet at school - parents/guardians sign a consent form when a child becomes enrolled in the school allowing their child access</i>				ü	ü	ü	
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Orange mark – child has a diagnosis but does not have medicine administered

Red mark – child has diagnosis and medicine id administered

Black mark – child’s photograph is not allowed to be taken/on social media

Yellow mark – there is an assessment in relation to this child under his/her file on Aladdin

Blue mark – sensitive family issues e.g. court order, separation, etc

Key

CT	Class Teacher	PO	Principal’s Offie
CSET	Co-ordinator Special	S	Secretary’s Office

	Education		
SET	Special Education Teacher	CMA	Co-ordinator Medical Administration
AL	Aladdin	A	Archives
FF	Feitheoireacht folder		

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**** Addenda:

- Foirm iarratas
- Foirm Chlárúcháin
- Personal Data Amendment/Erasure form
- Request to alter permissions form

Le deanamh:

Iarratas do Aladdin chun corás a chumadh chun na spriocdataí a chur in iúl dúinn go teicniúil as our modus operandi maidir le aois na páistí.

Check insurance to see if we are covered for a Cyber attack – is this additional cover?