



**TEMPLE
CARRIG
SCHOOL**

Data Protection Policy

1. Introduction

In the course of its activities, Temple Carrig School accumulates substantial amounts of personal information about pupils, parents, staff and management. It is therefore particularly important that appropriate procedures are in place for the protection and proper use of all accumulated data and records.¹

The school is committed to adhere to the provisions of the Data Protection Acts 1988 and 2003, and in doing so to afford adequate protection to all employees and students with regard to their personal information held by the school.

All personal information will be processed in a manner that complies with the following Data Quality Principles;

- Information will be obtained and processed fairly.
- All persons are made aware of the purpose for which information is kept.
- The information is only disclosed in a manner consistent with its purpose, and to recipients as agreed with the employee/student (or his/her parent/guardian).
- The information is kept safe and secure, and those working with the information are trained as to their responsibilities in this regard.
- The information will be kept accurate, up-to-date and complete.
- The information will only be retained for as long as required to complete the purpose specified for such information.

The Principal shall, from time to time, administer a Data Protection Audit. Consideration shall also be given to security of information held on the school computer networks.

2. Board of Management Records

Minutes of Board meetings shall record attendance, items discussed and decisions taken, and will be kept safely and securely in a permanent archive. Board of Management business shall be considered confidential to the members of the Board. However, there shall be an open and transparent means of communication between the Board and the members of the school community, and provision is made for the

¹ The school is not, however, required to register with the Office of the Data Protection Commissioner.

reporting of matters which are not considered confidential by members of the Board to staff, the Parents' Association Committee and the Student Council.

Personal issues relating to pupils or staff members should always be considered confidential and provision is made for the Board to designate particular issues as confidential. In dealing with admissions or discipline matters, students shall be referred to as "Student A", "Student B", etc.

Board of Management minutes, in so far as they are submitted to the DES may be subject to Freedom of Information demands at a later date by members of the public.

3. Employment Records

The Board of Management, as the employer of all teaching and non-teaching staff in the school, shall retain the following in relation to every staff appointment or promotion:

- The decision of the Board of Management to make a particular appointment.
- The nature and the job description of the appointment to be made.
- The agreed method of advertisement for the position.
- A record of all applications and appropriate qualifications of candidates.
- The agreed procedure for interview and selection. (In the case of teaching appointments the decision to convene the approved Selection Board).
- The record and notes of short-listing, interview and agreed assessment procedures.
- The Report of the agreed order of merit of the candidates.
- The decision of the Board of Management to appoint.
- The letter of appointment.

All of these records should be retained for as long as is required to answer any possible appeals that may occur.

4. Personnel Files

A "personnel file" is maintained for each member of staff. This personnel file shall contain:

- Original records of application and appointment to the post held.
 - Record of appointments to promotion posts.
 - Details of work record and noteworthy achievements.
 - Details of approved absences (career breaks, parental leave, study leave etc.)
 - Records of any formal disciplinary actions taken by the school management.
- Staff members shall be provided with copies of any such records and be informed of their right to appeal against the inclusion of such record in their files.

Upon joining Temple Carrig School, personal information will be requested from staff in order that the school may effectively administer the employment of the teacher.

This may include:

- (i) the teacher's P.P.S. number
- (ii) confirmation of the teacher's date of birth
- (iii) home contact details in case of emergency

All personal information regarding a teacher's employment will be held on computer and also in the teacher's personnel file. This information will not be disclosed to any external third party without the teacher's consent, except where necessary to comply with statutory requirements or where an organisation is acting on the school's behalf for example, the payroll administration supplier.

A staff member may, at any time, make a request for access to the information held about them. All staff members have the right to inspect their own personnel file within seven working days of the submission of a written request to do so. Viewing of all files will take place under the supervision of the Principal or other authorised school personnel.

5. Pupil Records

A personal file be maintained for each pupil enrolled in the school. This file may contain:

- Information sought and recorded at enrolment – PPS number, address and contact details, names and addresses of Parents/Guardians, previous academic record, any relevant special conditions which may apply.
- Academic Record – subjects studied, class assignments, examination results as recorded on official school reports.
- Records of significant achievements.
- Records of disciplinary events and/or sanctions imposed.
- Records of attendance and punctuality.
- Records of religious affiliation

Every effort is made to liaise with primary school authorities to ensure that relevant student records, assessments, psychological reports are transferred with the pupil on enrolment. This is done with the full knowledge and approval of parents and guardians. Similarly transfers of pupils between post-primary schools often includes the transfer of pupil records, again with the full knowledge and approval of parents.

Reports of disciplinary events and class performance record are also maintained in a student log-book folder in the staff-room to allow form teachers to identify ongoing patterns of good or bad behaviour.

Attendance records

Particular obligations regarding records of pupil attendance arise from the Education (Welfare) Act, 2000. Temple Carrig School follows the guidelines issued by the National Education Welfare Board (NEWB) for the collection, recording and reporting of these attendance records.

Access to student files

The student files are maintained by the Clerical Officer of the school, who is responsible for their security. Teachers may access, and add to, these files if it is considered to be in the interest of the student, and the information contained therein may be released to other parties (e.g.: DES Officials, NEWB, SENO, Gardaí, Health Officials etc) at the discretion of the Principal.

The school may refuse access to information obtained by them in confidence or for other Child Protection reasons including the following²:

- (i) Protecting records covered by legal professional privilege
- (ii) Protecting records which would facilitate the commission of a crime
- (iii) Protecting records which would reveal a confidential source of information.

Parents and/or students who are over 18 years of age are entitled to, and shall be facilitated in consulting their particular student file within seven working days of the submission of a written request to do so³. This is strictly subject to the Principal being satisfied that accessing the file does not impinge in any way upon the privacy rights of any other individual in the school. Viewing of all files will take place under the supervision of the Principal or other authorised school personnel.

6. Parent Records

The school does not keep personal files for parents or guardians. However, information about, or correspondence with, parents are included in the files for each student. This information shall be treated in the same way as any other information in the student file and may be accessed similarly.

The school keeps financial records which include records of fees paid and unpaid and any payments of the Voluntary Contribution. These records are administered by the Clerical Officer and are treated as strictly confidential. Parents are entitled to contact the school to seek details of their financial record, and shall be facilitated in such a way that the financial record of no other parent or family is divulged.

7. References

Verbal and written references and testimonials to staff and to pupils are undertaken on the understanding that they will be treated as strictly confidential and become the property of the individual to whom they are addressed. They should be fair, accurate, factual, and free from bias or inequity. Only authorised school personnel shall give references and testimonials and the use of school headed notepaper shall be carefully monitored. A staff member or pupil shall not have an automatic right to inspect a reference about them, but this may be facilitated at the discretion of the Principal.

8. Financial Records

The Board of Management maintains records of income and expenditure, class maintenance, stock records and other financial information. In doing so, the Board endeavours to meet the requirements of the Department of Education and Skills.

² In accordance with Section 1.5.1 and 1.5.2 of the *Child Protection Guidelines for Post Primary Schools*)

³ It shall be assumed that either the parents/guardians OR the student who is over 18 shall have equal access to the student file. In other words, the school does not need one party's permission before allowing the other party to view the file.

9. Length of time that information will be kept on file

In general personal data shall not be kept for any longer than is reasonably necessary to fulfil the function for which it was first recorded.

Relevant information in student files shall normally be kept for a period of five years after each particular year group has completed Leaving Certificate. Information which might be pertinent to an allegation of abuse will be retained indefinitely.

Relevant information in staff files shall normally be kept for a period of one year after the staff member has ceased to work in the school. Information which may be of importance in some way or other may be retained indefinitely.

Tax and Pay Records will be kept indefinitely.

Reports relating to accidents involving school personnel or occurring on school property shall be recorded and retained in accordance with guidelines from the State Claims Agency, the Health and Safety Authority, and the Department of Education and Science.

Approved by the Board of Management: 27th August 2013