

Data Protection Policy

Introductory Statement

This policy applies to all school staff, the Board of Management, parents and guardians of current students, parents and guardians of prospective or potential students and applicants for staff positions within the school in so far as the school handles or processes their personal data in the course of their dealings with the school and the measures under the policy relate to them. By enrolling your child in and/or by attending Stewarts School you acknowledge and agree to the collection and processing of personal information by the school.

Scope

Purpose of the Policy: The Data Protection Acts apply to the keeping and processing of personal data in both manual and electronic form. The purpose of this policy is to assist the school to meet its statutory obligations, to explain those obligations to school staff and to inform staff students and their parents how their data will be treated.

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 and 2003.

As more and more data is generated electronically and as technological advances enable the easy distribution and retention of this data, the challenge of meeting the school's legal responsibilities has increased. The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the principal and board of management to make decisions in respect of the efficient running of the school. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and board of management.

This policy sets out in writing the manner in which the personal data of staff, students, and other individuals is kept, protected, how long it will be stored, and with whom shared. The school recognises the seriousness of its data protection obligations and has implemented a set of practices to safe guard personal data. The school adheres to the fundamental principle "The data or, as the case may be, the information constituting the data shall have been obtained, and the data shall be processed, fairly". Data will be stored securely so that confidential information is protected in compliance with relevant legislation.

The school board of management (BOM) will follow the practical steps outlined below to ensure compliance with General Data Protection Regulations (GDPR.) GDPR is the law which applies to most kinds of processing of personal data and it applies directly in Ireland (and across the EU), along with further national rules set out in the Irish Data Protection Act 2018.

- a) They are aware of what data they currently hold and what data they are processing on an ongoing basis
- b) All staff are trained for their roles in relation to GDPR
- c) All school Staff are fully aware of the importance of Data Protection and that the school is a Data Protection Sensitive and Aware institution

d) Relevant Policies and Procedures are in place.

Any amendments to this Data Protection Policy will be communicated through the school website and other appropriate channels, including direct communication with data subjects where this is appropriate. The school is a *data controller of personal data* relating to its past, present and future staff, students, parents/guardians and other members of the school community. The responsibility of the Controller is assigned to the Board of Management. The Principal is assigned the role of co-ordinating the implementation of this Policy and for ensuring that all staff that handle or have access to Personal Data are familiar with their responsibilities.

This policy applies to the keeping and processing of personal data, including personal data held on school staff and students. The format in which records will be kept is a manual record (personal file within filing cabinet) computer record (database) or both. The school is obliged to comply with the principles of Data Protection as set out in the Data Protection Acts 1988 and 2003, the framework was changed in the Data Protection Act 2018 and summarised within the legal framework of the below mentioned documents: Data Protection Acts 1998 to 2018; EU Data Protection Directive 95/46/EC; EU GDPR 2018.

Data Protection Principles:

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 Acts and the terms of this Data Protection policy. The information will be obtained and processed fairly.
2. Keep it only for one or more specified and explicit lawful purposes: The School will inform individuals of the reasons they collect their data and will inform individuals of the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.
3. 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.
4. Keep Personal Data safe and secure: Only those with a genuine reason for doing so may gain access to the information. Sensitive Personal Data is securely stored under lock and key in the case of manual records and protected with firewall software and password protection in the case of electronically stored data. Portable devices storing personal data (such as data keys) should be encrypted and password protected before they are removed from the school premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data.
5. 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. The principal will delegate such updates/amendments to the administration staff. However, records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation will be dated and signed by the person making that change and added to the original student file.

6. 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.
7. 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 and Sensitive 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. (Please see Appendix 2 for retention schedule.)
8. Provide a copy of their personal data to any individual, on request: Individuals have a right to know what personal data/sensitive personal data is held about them, by whom, and the purpose for which it is held.

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.

- Under Section 9 (g) of the Education Act, 1998, the parents of a student, or a student who has reached the age of 18 years, must be given access to records kept by the school relating to the progress of the student in their education
- Under Section 20 of the Education (Welfare) Act, 2000, the school must maintain a register of all students attending the School
- Under section 20(5) of the Education (Welfare) Act, 2000, a principal is obliged to notify certain information relating to the child's attendance in school and other matters relating to the child's educational progress to the principal of another school to which a student is transferring
- Under Section 21 of the Education (Welfare) Act, 2000, the school must record the attendance or non-attendance of students registered at the school on each school day
- Under Section 28 of the Education (Welfare) Act, 2000, the School may supply Personal Data kept by it to certain prescribed bodies (the Department of Education and Skills, the National Education Welfare Board, the National Council for Special Education, other schools, other centres of education) provided the School is satisfied that it will be used for a "relevant purpose" (which includes recording a person's educational or training history or monitoring their educational or training progress in order to ascertain how best they may be assisted in availing of educational or training opportunities or in developing their educational potential; or for carrying out research into examinations, participation in education and the general effectiveness of education or training)

- Under Section 14 of the Education for Persons with Special Educational Needs Act, 2004, the school is required to furnish to the National Council for Special Education (and its employees, which would include Special Educational Needs Organisers (“SENOs”)) such information as the Council may from time to time reasonably request
- The Freedom of Information Act 1997 provides a qualified right to access to information held by public bodies which does not necessarily have to be “personal data” as with data protection legislation. While schools are not currently subject to freedom of information legislation, if a school has furnished information to a body covered by the Freedom of Information Act (such as the Department of Education and Skills, etc.) these records could be disclosed if a request is made to that body
- Under Section 26(4) of the Health Act, 1947 a School shall cause all reasonable facilities (including facilities for obtaining names and addresses of students attending the school) to be given to a health authority who has served a notice on it of medical inspection, e.g. a dental inspection
- Under Children First: National Guidance for the Protection and Welfare of Children (2011) published by the Department of Children & Youth Affairs, schools, their boards of management and their staff have responsibilities to report child abuse or neglect to TUSLA - Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

Garda Vetting Information

All adults working with children in any capacity within the school must be Garda vetted. Completed vetting forms are sent to the Human Resource Department at Stewarts Care and the results of vetting process are stored manually in a locked filing cabinet in the Principal’s office to which only authorised personnel may have access. Teachers are vetted through the Teaching Council and the vetting outcome is available through the Digitary Core which is password controlled by each individual teacher.

PURPOSE & LEGAL BASIS FOR COLLECTING & PROCESSING INFORMATION

Stewarts School collects and processes personal information about students and parents/guardians for a variety of purposes and relies on a number of legal grounds to do so. Stewarts school requires this information to perform our duties and responsibilities and to comply with our legal and statutory obligations. In addition, Stewarts School requires this personal information to pursue the legitimate interests of the school and our dealings with relevant third parties. The legitimate interests upon which we rely is the effective operation and management of Stewarts School and managing the education and welfare needs of our students. Stewarts School processes personal data on the basis of the following lawful purposes:

Consent

Stewarts School sometimes process some of students’ personal information with consent e.g. photograph which may be displayed on the school’s website or on social media platforms or in the print media. Please note that consent can be withdrawn at any time by contacting the school.

Legal Obligation

Stewarts school collects and process personal information to comply with our legal and statutory obligations, including, but not limited to those under the Education Act 1998 (as Amended), the Education (Welfare) Act 2000, the Education for Persons with Special Needs (EPSEN) Act 2004, the Health Act 1947, the Children First Act 2015, the Child Protection Procedures for Primary and Post-Primary Schools 2017, the Teaching Council Acts 2001-2015 and Safety Health and Welfare at Work legislation

Vital Interest

Stewarts School may hand over someone's information in an emergency situation.

Legitimate Interest

Stewarts School may also process personal information to:

Enable students to develop to their full potential and meet the educational, social, physical and emotional requirements of the student,

Enable Parents and Guardians to be contacted in the case of emergency, school closures and to inform Parents and Guardians of their child's educational progress,

Secure and benefit from the support and services of relevant third parties.

Performance of a Contract

Stewarts School may process specific information from an employee so that they can enter into a contract of employment.

Stewarts School may collect the following personal information on students:

Student records

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 membership of the Traveller community, where relevant whether they (or their parents) are medical card holders
- whether English is the student's first language
- any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply
- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements). Records of significant achievements
- Records of disciplinary issues/investigations and/or sanctions imposed
- Other records e.g. records of any serious injuries/accidents etc.
- Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures)

Purposes: The purposes for keeping student records are:

- to enable each student to develop to their full potential

- to comply with legislative or administrative requirements • to ensure that eligible students can benefit from the relevant additional teaching or financial supports
- to enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or to inform parents of school events etc.
- to meet the educational, social, physical and emotional requirements of the student
- photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school.
- to process enrolment applications, to ensure that the student meets the school's admission criteria
- 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

Location: In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access. On a computer database which is accessed only through password protection.

Security: Manual record (personal file within a relevant filing system), computer record (database). Manual records are stored in locked filing cabinets in the administration office and are accessed only by authorised personnel. Computer records are stored in a password protected programme which is accessed only by authorised personnel.

Stewarts School may collect the following personal information on staff:

Staff Records (including where relevant volunteers, trainee teachers on work experience/work placement, student nurses on work placement)

These may include (as relevant)

- name, address and contact details, PPS number, date of birth, Teaching Council No., contact details of next of kin (in case of emergencies)
- original records of application, appointment, promotion, posts etc.
- record of appointment to promoted posts
- details of approved absences
- details of work record (qualifications, classes taught)
- details of approved leave
- details of sick leave and or health/safety documents
- Garda vetting outcomes
- medical certificates
- safeguarding records
- details of complaints and or workplace procedures and or grievances including consultation or competency discussions action/improvement/evaluation plans and records of progress
- details of accidents/injuries sustained on school property or in connection with staff member carrying out their school duties

Note a record may be maintained which is distinct from and separate to individual personnel files.

Purpose: the purpose of keeping staff records is for:

- human resource management now and in the future
- to facilitate payments to staff
- to comply with DES circulars, employment law legislation
- record promotions made
- to enable the school to comply with requirements set down by the Department of Education and Skills, Revenue Commissioners, National Council for Special Education, TUSLA, HSE and any other Government body statutory and/or regulatory department and/or agencies in the context of working with children and vulnerable adults
- to facilitate pension pay for staff and for verification and dispute resolution
- for compliance with legislation relevant to the school.

Location: In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access. On a computer database which is accessed only through password protection. Aladdin used cloud computing.

Security: Manual record (personal file within a relevant filing system), computer record (database). Manual records are stored in locked filing cabinets in the administration offices and are accessed only by authorised personnel. Computer records are stored in a password protected programme which is accessed only by authorised personnel. Employees are required to maintain the confidentiality of any data to which they have access. Each staff member has a personal file maintained in a locked filing cabinet in the office. Personal Contact details, PPS numbers, class records, duty lists and reports are stored on the office/Principal's computer and in the cloud by Aladdin Systems.

Board of Management Records:

Board of management records may include:

Name

Records in relation to appointment to the board

Minutes of Board of management meetings

Correspondence to the board which may include reference to particular individuals

Financial statements/audits and certification of accounts

Record of how funding from the DES is managed.

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.

Other Records

The school may receive or hold records from time to time which are necessary and incidental to the orderly running of the school.

Sharing/Transfer of Data: The level of sharing and the nature of what is shared depend on the purpose. The Government bodies to which the school will transfer personal data to will use personal data for their own purposes (including: to verify other information they already hold about you, etc.) and they may aggregate it with other information they already hold about a person and their family. The school is legally required to provide certain records relating to the progress of a student (under 18 years) in his/her education to the student's

parents/ guardians. The data controller, (normally the Principal of the school may supply data kept by her, or information extracted from such data, to the data controller of another prescribed body if satisfied it will be used for a relevant purpose only.

Providing Information over the Phone

Any employee dealing with telephone enquiries should be careful about disclosing any personal information held by the school over the phone. In particular the employee should:

- Check the identity of the caller to ensure that information is only given to a person who is entitled to that information
- Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified
- Refer the request to the principal for assistance in difficult situations. No employee should feel forced into disclosing personal information

INFORMATION AND THIRD PARTIES

Stewarts School may receive from, share and/or transfer personal information as necessary to a range of third parties such as the following:

- The Department of Education and Skills
- TUSLA/the Child and Family Agency
- The National Council for Special Education (NCSE)
- National Educational Psychological Service (NEPS)
- HSE
- Department of Social Protection and/or other state benefit providers
- An Garda Síochána
- School Insurance Provider
- Revenue Commissioners
- Stewarts Care Respite and Afterschool Services
- Stewarts Care Clinicians
- Other education providers
- IT service providers and administrators
- Security providers
- Legal providers
- Providers of security and administrative services, including data processing/cloud storage service providers e.g. POD, Aladdin, Esinet
- Other Service Providers: We may share personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, including, printers, and other advisors.

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:

- Child Protection Policy
- Communication Books Guidelines
- Anti-Bullying Policy

- Code of Behaviour
- Mobile Phone Use
- Admissions Policy
- Substance Use Policy
- ICT Policy
- SPHE Policy.

Student Information

- Personal details such as name, address, date of birth, gender, PPS number, nationality, emergency contact information and information in relation to the student's family as may be required,
- Any Special Education Needs (SEN),
- Any Child Protection information,
- Academic records, school reports, student learning needs, student behaviour needs, permission for access to educational reports, individual education and learning support plans,
- Student profiles (including whether English is the student's first language)
- Psychological referral/assessment documentation and permission for access to psychological reports,
- Information for the Primary Online Database (POD),
- Information for Special Educational Needs Organiser (SENO),
- Information for TUSLA (the Child and Family Agency) and/or the Health Service Executive (HSE),
- Attendance records and explanatory notes in relation to absences (Aladdin),
- incident and accident reports, investigations
- Permission notes in respect of school activities e.g. school tours/trips and outings, extra-curricular activities, (including Curricular, RSE/Stay Safe Programme(s))
- Photographs and recorded images of student(s) (including at school events),
- School Transport information,
- CCTV footage and other information obtained through electronic means leave in for new school? ,
- any other personal information on student as the school deems relevant

Sensitive Personal Information Students

Stewarts School may collect and process the following special categories of more sensitive personal information such as:

- Information about students' health, medical certificates, medical needs, allergies and consent for administration of medicine,
- Religious belief and confirmation of engagement or not in Religious Sacraments,
- Racial or ethnic origin.
- any other sensitive personal information on students as relevant

Parent/Guardian Information

Stewarts School may collect and process the following personal information from parents/guardians such as:

- Contact details of parent/guardian e.g. name, address, email address, telephone number(s)
- Information regarding legal orders in respect of any family law disputes in respect of guardianship, custody or access,
- Occupation and nationality,
- Number of children, position of student(s) in family,
- Consent in respect of medical/other emergencies,
- Consent in respect of school activities e.g. school tours/trips and outings, extra-curricular activities,
- Consent to publish photographs and schoolwork of students on school website / print media etc.,
- Records, correspondence or notes arising from interaction with Parents / Guardians,
- **[any other personal information from Parents/Guardians – school to insert as relevant]**

HOW PERSONAL INFORMATION IS COLLECTED

Students

Stewarts School collect personal information about students through the admissions process and/or through expressions of interest in relation to enrolment. Additional information is collected from third parties, including former schools and through school activities and general interaction(s) during the course of the student's time at Stewarts School

Stewarts school collect personal information about parents and guardians through the admissions process or expressions of interest for enrolment. We collect additional personal information through general interaction during the course of the student's time at Stewarts School

Staff and others

Stewarts school collect personal information through recruitment processes, links with outside agencies that provide services to the school e.g. Community Employment Scheme.

DATA RETENTION

Stewarts School will only retain personal information for as long as it is necessary to fulfil the purposes the information was collected for, including any legal, accounting or reporting requirements (Appendix 2 Retention Schedule).

INDIVIDUAL RIGHTS

Individuals have several rights under GDPR which in certain circumstances are limited and/or constrained. These individual rights include the right – free of charge and subject to any limitations as may apply – to:

1. Request a copy of the personal information held about the individual;
2. Rectify any inaccurate personal data held about the individual;
3. Erase personal information held about the individual;
4. Restrict the processing of individual personal information;
5. Object to the use of individual personal information for our legitimate interests;
6. Receive individual personal information in a structured commonly used and machine-readable format and to have that data transmitted to another data controller.

Appendix 1: Stewarts School Subject Access Request Form

Request for Access to Personal Data under the General Data Protection Regulation (GDPR)

Section 1: Details of Data Subject (person making request)

Please use block capitals when filling in details below

Full Name	
Address	
Eircode	
Contact number	
Email Address	

Section 2: The details of my request are:

Please provide as much information as possible to assist us to identify and locate the personal information requested, including any specific identifiers (reference numbers, ID numbers, etc.)

The period of time for which data is sought: *Please indicate the timeframe for your request (e.g. September 2019 or January 2020-April 2020)*

Section 3: Verification of Identity

In order for us to verify your identity, please provide: Copy of one form of photographic identification (tick whichever provided):

Current Passport or Current Driving Licence or Public Services Card or Other Official ID (please specify) _____

AND Copy of one of the following as proof of address (tick whichever provided):

Utility Bill (Electricity, Gas, Telephone etc.) or Government Letter (Revenue, Social Protection etc.) or Insurance (Car, Home, etc.)

Section 4: Form of Communication

Please tick as appropriate the manner in which you wish to receive correspondence in relation to your request:

Postal address as provided in your Data request details as listed above

Email address as provided in your Data request details as listed above

Data in this school will be processed in line with the data subjects' rights.

For information on access requests please see Appendix 1. If you wish to exercise any of these rights please contact us at the school by phone 01 6518285 or email school@stewartscare.ie. Stewarts School will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why. You also have the right to lodge a complaint to the office of the Data Protection Commission.

Ratification and Communication

This Data protection Policy has been ratified by the Board of Management on

Parents/Guardians will be informed of the Data Protection Policy at time of enrolment of the student by providing parents/guardians with a copy of the Data Protection policy. The Data Protection policy will be available on the school website

Monitoring and Implementation of the Policy

Implementation of the policy will be by the Principal. At least once a year a report will be issued to the Board of Management to confirm that the actions and measures set down under the policy are being implemented.

Development and Evaluation of the Policy

The policy should be reviewed as the need arises or every 2 years. Ongoing review and evaluation will take cognisance of any changes to information or guidelines from the data Commission Commissioner, Department of Education, legislation or feedback from parents guardians and school staff and others. The policy should be revisited as necessary in the light of such review and evaluation within the framework of the school plan.

Signed: 

Chairperson

On behalf of the Board of Management

Date: March 16th 2020

Appendix 2: Data Retention Periods for Stewarts School

<i>Pupil Related</i>	<i>Retention Periods</i>
School Register/Roll Books Enrolment Forms Disciplinary notes Test Results – Standardised Psychological Assessments etc. SEN Files/IEPS Accident Reports Child Protection Reports/Records S.29 Appeals Records of school trips/tours including permission slips Record of complaints made by parents/guardians	Indefinitely Hold until Pupil is 25 Years Never Destroy Hold until pupil is 25 Years Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy Never Destroy Depends on the nature of the complaint, if it is a child safeguarding complaint relating to a teacher-handling or an accident, then retain indefinitely, never destroy If it is a complaint of a mundane nature (misspelling of name, parent not being contacted to inform of a parent teacher meeting) or other minor matter then student reaching 18 years plus 7 years(6 years in which to make a claim against the school, plus 1 year)
<i>Interview Records: Recruitment Process</i>	
Interview Board Selection Criteria/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 being taken, then confidential shredding
<i>Staff Records</i>	
Contract of Employment Teaching Council Registration Vetting Records Application and CV Qualifications and references Accident/Injury at Work Reports Interview database of applications(section which relates to employee only) Recruitment medical Job specification/description Probation letters/forms POR application and correspondence Leave of absence application	Retention for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) then confidential shredding Must be kept for 8 years or for duration of

<p>Job share Career Break Maternity Leave</p> <p>Parental leave Force Majeure Carers leave</p> <p>Paternity Leave</p> <p>Working Time Act</p> <p>Application of candidates not shortlisted and candidates shortlisted who do not take up offer Interview board marking scheme and board notes Panel recommendation by interview board</p> <p>Allegations/complaints</p> <p>Unsolicited applications for Jobs</p>	<p>employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) then confidential shredding</p> <p>Retain for 2 years following retirement /Resignation or for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) then confidential shredding Retention for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) there is a statutory obligation to retain for 3 years then confidential shredding</p> <p>18 months from the close of competition: 12 months from the close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being made then confidential shredding</p> <p>Retention for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) Note relevant DES Circular re Disciplinary Procedures</p> <p>Confidential shredding</p>
<i>Superannuation/Pension/Retirement Records</i>	
<p>Records of previous service</p> <p>Pension calculations</p> <p>Pension Increases</p> <p>Salary claims forms</p>	<p>DES advise keep indefinitely</p> <p>Retention for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school)(whichever is the longer)</p>
<i>Occupational Health Records</i>	
Sickness/absence/certificates	Retain for 7 years (6 years to make a claim against the school plus 1 year for proceedings

<p>Pre -employment medical assessment</p> <p>Occupational Health Referral</p> <p>Correspondence re retirement on ill health grounds</p> <p>Accident/injury at work reports</p> <p>Medical assessments or referrals</p> <p>Sick Leave records (benefit forms)</p>	<p>to be served on school) unless sickness accident injury sustained in relation to or in connection with the individual's duties within the school, in which case do not destroy</p> <p>Retain for 10 years or for duration of employment + 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school)</p> <p>Retain for 7 years (6 years to make a claim against the school plus 1 year for proceedings to be served on school) unless MEDMARK assessment relates to an accident or injury sustained in relation to or in connection with the individual's duties within the school, in which case do not destroy</p> <p>In case of audit/refunds, current year plus 7 (6 years to make a claim against the school plus 1 year for proceedings to be served on school) then confidential shredding</p>
<i>Board of Management Records</i>	
<p>BOM Agenda and Minutes</p> <p>School closure</p>	<p>Indefinitely</p> <p>On school closure, records should be transferred as per <u>Records Retention in the Event of School Closure/Amalgamation</u>.</p>
<i>Other School Based Reports</i>	
<p>Principal's monthly report including staff absences</p> <p>CC TV Recordings</p>	<p>Indefinitely</p> <p>28 days normally. In the event of criminal investigation – as long as is necessary</p>
<i>Financial Records</i>	
<p>Payroll & Taxation</p>	<p>Revenue require a 6-year period after the end of the tax year then confidential shredding</p> <p>Retain for 7 Years then confidential</p>

Invoices/receipts	shredding
Audited Accounts	Indefinitely

Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age?

The reasoning is that a pupil reaches the age of majority at 18 years and that there should be a 6-year limitation period in which it would be possible to take a claim against a school, plus 1 year for proceedings to be served on a school. The Statute of Limitations imposes a limit on a right of action so that after a prescribed period any action can be time barred.