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## General Data Protection Policy

### A. **Rationale for the GDPR**

The General Data Protection Regulation (GDPR) has been agreed at the EU Parliament. It has been in force since 25<sup>th</sup> May 2018. Schools / Churches are regulated by this legislation, hence the purpose of this policy.

### B. **Awareness**

The Board of Management under the CPSMA is considered an organisation responsible for holding personal data. The Board of Management is referred to as a "DATA CONTROLLER" and the people/persons to whom that data relates is a "DATA SUBJECT". A "DATA PROCESSOR" is a person / third party who processes personal information.

The Data Controller of St Patrick's Senior National School is the Board of Management which requires them to approve and support this policy. Any person to whom the data relates is a data subject.

### C. **Guiding Principles**

The following eight data protection principles are what has guided and will guide / direct our policy:

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

### D. **Legal Basis for Processing Data**

All types of data processing being carried out should be looked at and the legal basis for carrying it out and this should be documented.

### E. **Information Held**

Information being held will be documented, where it came from and who it will be shared with. An audit will be done biannually using the following criteria:

1. Why are we holding it?
2. How did you obtain it?
3. Why it was originally gathered?
4. How long will you retain it?
5. How secure is it, both in terms of encryption and accessibility?
6. Do you ever share it with third parties and on what basis might you do so?

#### **F. Accountability**

We at St Patrick's SNS work under the following principles / accountability criteria:

1. Do we need this information?
2. Is it duplicated?
3. What access controls are there to ensure it is accessible only to the people who need it?
4. Have we a log of who has accessed and edited it?
5. Can we easily retrieve, edit or delete it on a per-person basis, if we receive a "SUBJECT DATA REQUEST"?
6. How long will we retain it?
7. In the event of a breach, we would seek clarification by referencing the Regulatory Body, (Data Protection Regulator) as to whether the information is classed as 'high risk / low risk'.
8. Is consent for holding the data required? If so, has it been obtained?

#### **G. As we go through our audit / following the audit**

1. Date of audit / future audits.
2. For each data set, eg names of children enrolling / baptised, we will state the date protection principle under which the data is processed.
3. We will list the data kept, by whom and where.

#### **H. Compliance with Data Protection**

The following are in compliance with GDPR:

1. Pupil Applications / Baptism Cert
2. Current Pupil Files / All Registers
3. Past Pupil Records
4. Written records, both formal and informal
5. Records of accidents
6. Psychological Reports
7. Individual Education Plans
8. Tour permission slips / PE sessions offsite
9. Permission slips to attend / be withdrawn for Special Education Needs Support
10. Permission Slips for Diagnostic Testing

- 11. School Insurance Forms
- 12. Book Rentals
- 13. Other documentation containing personal data

- 1) This statement will be published on the school's website and has been provided to all members of school personnel, the Parents' Association and the patron. It is readily accessible to parents and guardians on request. A copy of this Statement will be made available to Tusla and the Department of Education (or any of its agents) if requested.
  
- 2) This General Data Protection Regulation Policy will be reviewed annually or as soon as practicable after there has been a material change in any matter to which this statement refers.

This General Data Protection Regulation Policy was adopted by the Board of Management on \_\_\_\_\_.

Signed: \_\_\_\_\_  
Chairperson of Board of Management

Signed: \_\_\_\_\_  
Principal/Secretary to the Board of Management

Date: \_\_\_\_\_

Date: \_\_\_\_\_

