

# Cabra Central School

## Data Protection and Record-keeping Policy

### Introduction

This Data Protection Policy applies to the **personal data** held by Cabra Central School is protected by the Data Protection Acts 1988 to 2018 and the EU General Data Protection Regulation (GDPR).

The policy applies to all school staff, the Board of Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school) insofar as the measures under this Policy relate to them. Data will be stored securely, so that confidential information is protected in compliance with relevant legislation. This policy sets out the manner in which personal data and sensitive personal data will be protected by the school.

Cabra Central School operates a “Privacy by Design” method in relation to Data Protection. This means we plan carefully when gathering personal data so that we build in the data protection principles as integral elements of all data operations in advance.

We audit the personal data we hold in order to

1. be able to provide access to individuals to their data
2. ensure it is held securely
3. document our data protection procedures
4. enhance accountability and transparency

### Data Protection Principles

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. As such, the school is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 to 2003 and GDPR, which can be summarised as follows:

- **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. The information will be obtained and processed fairly.

- **Consent:** Where consent is the basis for provision of personal data, (e.g. data required to partake in individual and class photographs/sponsored walks/ school tours or any other optional school activity) the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes. Cabra Central School will require a clear, affirmative action e.g. ticking of a box/signing a document or completing a consent form on Aladdin to indicate consent. Consent can be withdrawn by data subjects in these situations.
- **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.
- **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.
- **Keep Personal Data safe and secure:** Only those with a genuine reason for doing so may gain access to the information. Sensitive or 'Special Categories' of Personal Data is securely stored under lock and key in the case of manual records and protected with password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) 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.
- **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.
- **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.

- **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.
- **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.

## **Rationale**

In addition to its legal obligations under the broad remit of educational legislation, Cabra Central School has a legal responsibility to comply with the Data Protection Acts 1988 to 2018 and the GDPR.

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared. 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.

## **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. *For example:*

- 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.
- Where reports on pupils which have been completed by professionals, apart from Cabra Central School staff, are included in current pupil files, such reports are only passed to the Senior Primary school following express written permission having been sought and received from the parents of the said pupils.
- 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, Tusla, the National Council for Special Education and other schools). The BoM must be 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; 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) such information as the Council may from time to time reasonably request.
- The Freedom of Information Act 2014 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 most schools are not currently subject to freedom of information legislation, (with the exception of schools under the direction of Education and Training Boards), 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 by that body 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 pupils 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 Act 2015, *mandated persons in schools* have responsibilities to report child welfare concerns to TUSLA- Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána)

## **Relationship to School Ethos**

We promote openness and co-operation between staff, parents and pupils as a means of providing a supportive environment where students can develop to their full potential. The school wishes to achieve these aims/missions while fully respecting individuals’ rights to privacy and rights under the Data Protection Acts and GDPR.

## **Personal Data**

The personal data held by the school may include:

### **(i) Enrolment Forms**

#### **Data Given**

The following information is collected for each pupil on enrolment:

Name\*

Birth Certificate Name\*

Address\*

PPSN\*

Mother’s Birth Surname\*

Parents’ Names and contact details

Nationality\*

Mother Tongue\*

Siblings  
Previous school and class\*  
Application date  
Details of any relevant medical history  
School progress to date  
Religion\*\*  
Ethnicity\*\* \*

\* These details are entered on the Primary Online Database and Aladdin (see below)

\*\* These are optional fields in our application form. As they are considered sensitive personal information under the Data Protection Acts, they can only be recorded on POD with the explicit written consent of the pupil's parent(s) or guardian(s).

### **Access**

Relevant information is uploaded to Aladdin (see above).  
Hard copies of the data are stored in a child's personal file, in a locked cabinet, in the principal's office and are accessible only by the staff of the school.

### **Data Retention**

This information is retained until the child reaches 25 years of age as per the Data Retention Periods for Schools.

### **Shared with 3rd Parties**

Pupils files kept within the school are not shared with any 3rd party for any reason.

## **(ii) Primary Online Database (POD)**

The Primary Online Database (POD) is a nationwide individualised database of primary school pupils, facilitating the monitoring of educational progress as pupils move through the primary education system and on to post-primary school.

### **Collection of Data for POD**

The information which is uploaded to POD for each pupil is taken from the application form which parents/guardians complete when they apply for a place in the school. Parents are reminded regularly to keep the school informed of any changes of address or contact details. The Department has consulted with the Data Protection Commissioner in relation to the collection of individual pupil information for the Primary Online Database. As both religion and ethnic and cultural background are considered

sensitive personal data categories under Data Protection legislation, it is necessary for each individual pupil's parent/guardian to identify their own religion and ethnic or cultural background, and to consent for this information to be transferred to the Department of Education and Skills. All other information held on POD is deemed to be non-sensitive personal data and therefore does not require written permission from parents for the information to be transferred to the Department. It should also be noted that if a parent objects to having their children's details on POD, they must submit their objections in writing so that the school can have an accurate record of the number of pupils. Please note that this objection should be sent to the school. In the case where parents or guardians object in this manner, a partial record of their child will be created on POD; that is, an unidentifiable record. Please note that verbal objections to a pupil's data being placed on POD will not suffice, as schools are required by the Department to maintain written records of objections. It is also important to note that all pupils must have a record on POD in order to be counted for school's capitation payment and teacher allocation purposes.

### **Access**

The secretary and the administrator, in this instance, the Principal, have access to the system. This system is a secure one and requires personal information and a password to access. Access within the Department to POD data is limited to the POD team, which currently consists of fewer than 15 people.

### **Data retention**

Identifiable pupil data will be retained until the pupil's 19th birthday, so when a child has reached his 19th birthday his records will be anonymised and their personal details – PPSN, name, address – deleted. The anonymised records will then be used for statistical and longitudinal analysis.

### **Shared with Third Parties**

The Department proposes in the future to share some of the personal data stored on POD with other State bodies.

These are:

- Central Statistics Office, under the Statistics Acts to assist with the compilation of national statistics.
- The National Council for Special Education, under the Education Welfare Act, in order to assist in supporting resource allocation in relation to pupils with special educational needs.

- The Child and Family Agency, under the Education Welfare Act, to ensure that each child of compulsory school age is in receipt of an education.
- To meet the Department's business needs in regard to the allocation of resources to schools, the Department will share a limited amount of each pupil's personal data, including a child's PPS number with the Department of Public Expenditure and Reform PPSN validation service, or directly with the Department of Social Protection Client Identity Database area, in order to validate the identity of each pupil and ensure that the correct resource allocation is granted to each school.

The legal basis for this sharing of data is set out in the Social Welfare Acts. The Department will put in place a memorandum of understanding with each of these bodies, which includes information, the purpose and legal basis for which the body requires the data, how it will be stored securely, and for how long it will be retained.

#### **How secure is POD?**

Data recorded on POD is stored securely in the Department's database. This database is hosted on the Department's servers which are located in the Revenue Commissioner's data centre. Access to the servers is protected by both Revenue and Government Networks firewalls. Staff of the Revenue Commissioners do not have access to the data in the database. Data from POD is not stored in a cloud-based system. Schools have responsibility to ensure the safety and security of all pupil data which they hold. They may only access the data of students currently enrolled in their schools on the POD system

### **(iii) Aladdin**

Cabra Central School uses Aladdin, an online school administration system, for many reasons which are outlined below.

#### Collection of Data Aladdin

- Holds the same information as outlined above for POD. It also allows the school to hold the child's GP details and emergency contact details to allow the staff to best support a child if there was an accident or the child fell seriously ill within the school.
- Allows us to uphold the legal obligation of maintaining pupil enrolment and attendance records (Clárleabhar, Leabhar Rolla and Leabhar Tinrimh Laethúil) following the introduction of the Primary Online Database (POD) in line with circular 0033/2015.
- It allows access to POD (see above).

All information that is processed through Aladdin is freely given by parents on the enrolment application form that parents are required to complete before a place in school is offered. Parents are asked to update their information when there are any changes made, i.e.: a move, new telephone number, change in circumstances etc.

### **Access**

Aladdin allows the school to set parameters for each staff member's access to Aladdin. The school secretary, as an administrator, manages this access. The class teachers only have access to their particular class and the Learning Support teachers only have access to pupils with whom they are working. Access for class teachers is put in place by the secretary before the beginning of each school year. The School Principal is also an administrator with access to all records that are kept on Aladdin, but it is the secretary who looks after access on a day to day basis

### **Data Retention**

Information held on Aladdin relating to a child will be retained until the child reaches 25 years.

### **Shared with Third Parties**

Aladdin can be used to share information with POD (see above) and to share information with other staff members. Emails and text messages can be sent through Aladdin but no other 3rd party has access to Aladdin. The quarterly figures are sent to NEWB (National Educational Welfare Board) now under Tusla. These represent the number of children absent for more than 20 days and the number of suspensions given. NEWB only has access to the data sent in by the school and cannot access the personal data of any given child through Aladdin.

## **(iv) National Educational Psychological Services (NEPS)**

A NEPS psychologist is usually assigned to a school and would be the first port of call for a number of reasons:

- A behavioural difficulty within the school.
- A concern about an ongoing learning difficulty (requiring an educational assessment)
- A critical incident in the school.

### **Data given**

No data is passed on without the express consent of the parents/guardians. The parents/guardians are required to complete a form concerning their child and to sign to allow information to be passed from the school to the psychologist and vice versa. Data that is given to the psychologist regarding the child is treated as strictly confidential and is not allowed to be discussed with any other parties than those directly involved with the child. Where a behaviour is being discussed, no names or personal information is given at the outset until the parents have been informed and given permission.

### **Access**

Where parental permission is given the psychologist may wish to access the child's standardised tests and any other relevant information that the school holds. No photocopy of these are permitted and only scores may be recorded for further purposes. The psychologist will liaise with the school and the parents and a copy of any report will be given to both parties, with express permission from the parents. These reports are kept in a locked file in the Principal's office and access is given to the class teacher only. The report cannot be taken off the school premises under any circumstance.

### **Data retention**

As per Data retention period guidelines for schools – psychological assessments are never to be destroyed.

### **Shared with 3rd Parties**

The parents/guardians are required to give their permission to share any psychological reports with a 3rd party. This will only be raised if the child in question was referred on to another agency such as Tusla.

## **(v) Tusla**

Tusla is an umbrella agency for a wide range of services. The ones that impact directly on schools are as follows:

EWO – Educational Welfare Officer

Social Work services – Children First

Alternative Care and Adoption Services

### **Data Shared**

Tusla is a unique organisation in so far as school personnel do not need to inform parents if they are officially reporting a concern. Best practice states that the parents

should be informed as long as it does not put the child in the direct line of harm as a result.

The data that is shared in a report such as this is the personal information of the child and their family.

### **Access**

The social work team have access to all data sent through to Tusla and they can request further information from the school / parents.

### **Data Retention**

Any enquiry or report made to Tusla must be kept indefinitely in accordance with the Data Retention Periods for schools.

### **Shared with 3rd Parties**

Data that the school provides to Tusla in the case of a mandated report can be shared with any agency that has a vested interest in the protection of the child, for example An Garda Síochána, the Education Welfare Officer or other party within Tusla. Tusla are guided by their own GDPR regulations in this regard.

## **(vi) Testing**

Standardised tests take place once a year for all children from 1<sup>st</sup> – 6th class. Throughout the year other, more specialised tests may take place.

### **Purpose**

The main purpose for which these examination results and other records are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about their education. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and such other similar bodies.

### **Access**

The Learning Support teacher, class teacher, Deputy Principal and Principal. Standardised test results from 2nd, 4th and 6th class are given to the Department but no names or personal information is given. Paper records are stored in a filing cabinet in the Principal's office and a locked cupboard in the Special Education Room.

### **Data Retention**

All tests are kept until the child reaches the age of 25 as per the Data Retention Periods for Schools. Standardised tests booklets are shredded but the results are kept on record indefinitely.

### **Shared with 3rd Parties**

The results are shared with parents of the children only through a report card at the end of the year and at the Parent/Teacher meetings early the following year. The results only are shared with the Department (please see above). The NEPS psychologist may request to see tests but only with parental permission.

## **(vii) End of Year Report**

### **Data Given**

Annual School Report format in accordance with NCCA guidelines are sent to parents in June. Reports are sent home with pupils following a text-a-parent message.

### **Access**

End of year reports are kept in a folder and stored in a locked filing cabinet in the office. Teachers in the class have access to the report cards. The Principal and Deputy Principal also have access to the reports. Parents may receive a copy of the report upon request.

### **Data Retention**

All reports are kept on file until the child reaches the age of 25 – as per the Data Retention Period for Schools. Behavioural Reports are never to be destroyed – as per Data Retention Period for Schools.

### **Shared with 3rd Parties**

If a child moves school a copy of their final report will be sent to their new school upon request. When 6th class transition into Post-Primary a copy of their Passport report is given to their chosen second level school.

## **(viii) CCTV Images/Recordings**

CCTV is installed in Cabra Central School. Cameras are installed in various locations on the external walls of the school building. This CCTV system may record images of staff, students and members of the public who visit the premises. The viewing station is in the store room in the library hall.

### **Purpose**

Safety and security of staff, students and visitors and to safeguard school property and equipment.

### **Access**

Access to images/recordings is restricted to the Principal and Deputy Principal of the school. Recordings are retained for 28 days, except if required for the investigation of an incident. Images/recordings may be viewed or made available to An Garda Síochána pursuant to Data Protection Acts legislation.

## **(ix) Other Student Records**

### **Other student records may contain:**

- Assessment tests /Screening Test
- Records of students who have been granted exemption for the study of Irish.
- Teacher – designed tests. Each class teacher designs his/her own test template.
- Individual Education Plans and records of meetings with the stake holders regarding these plans.
- Special Education Data such as records of permission/refusal to access LS/RT services in the school.
- Details of behavioural incidents/ bullying incidents.
- Accident Report Book detailing injury and treatment applied.
- Administration of Medicines Indemnity Form.

### **Data Storage**

- 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.
- Paper Records are kept in a secure filing cabinet in the office. Computer records are kept on password protected PCs.
- Computer systems are password restricted.
- Personal information on computer screens and in files is shut down and put away as soon as possible after use.
- Personal data no longer required is shredded.
- Old computers have their memory wiped before they are disposed of.

- Teachers must use school laptops solely for school business and are responsible for ensuring that they are not used or viewed by any other party.

### **Data Retention**

Personal data will not be consciously kept for longer than is necessary to fulfil the function for which it was first recorded. Our school will follow the guidelines on the schedule of record retention attached. All records are stored in the school until the past pupil reaches the age of 21 + 7 Years.

## **(x) Staff Data**

As well as records for existing members of staff (and former members of staff), records may also relate to applicants applying for positions within the school, trainee teachers and teachers under probation.

### **Purpose**

The purposes for which staff personal data is processed include the following:

- the management and administration of school business (now and in the future);
- to facilitate the payment of staff, and calculate other benefits/ entitlements (including reckonable service for the purpose of calculation of pension payments, entitlements and/or redundancy payments where relevant);
- to facilitate pension payments in the future;
- human resources management;
- recording promotions made (documentation relating to promotions applied for) and changes in responsibilities etc.;
- to enable the school to comply with its obligations as an employer including the preservation of a safe, efficient working and teaching environment (including complying with its responsibilities under the *Safety, Health and Welfare at Work Act. 2005*);
- to enable the school to comply with requirements set down by the Department of Education and Skills, the Revenue Commissioners, the National Council for Special Education, TUSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies;
- and for compliance with legislation relevant to the school.

### **Data Given**

These staff records may include:

- Name, address and contact details, PPS number.
- Name and contact details of next-of-kin in case of emergency.
- Original records of application and appointment to promotion posts
- Details of approved absences (career breaks, parental leave, study leave, etc.)
- Details of work record (qualifications, classes taught, subjects, etc.)
- Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their school duties
- Records of any reports the school (or its employees) have made in respect of the staff member to State departments and/or other agencies under Children First Act 2015.

### **Data Storage**

- In a secure, locked filing cabinet in the office 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.
- Paper records are kept in a secure filing cabinet in the office. Computer records are kept on password protected PCs.

## **(xi) Board of Management**

### **Data given**

- Name, address and contact details of each member of the Board of Management (including former members of the Board of Management)
- Records in relation to appointments to the Board
- Minutes of Board of Management meetings and correspondence to the Board which may include references to individuals.

### **Purpose**

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.

### **Data Storage**

In a secure, locked filing cabinet in the office 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.

## **Providing information over the phone**

In our school 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.

## **Links to other policies**

Our school policies need to be consistent with one another, within the framework of the overall School Plan. 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 Procedures

Bí Cineálta Policy

Code of Behaviour

Admissions/Enrolment Policy

CCTV Policy

Substance Use Policy

Acceptable Use Policy

Critical Incident Policy

Health and Safety Policy

Special Educational Needs Policy

SPHE Policy

## **Processing in line with data subject's rights**

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

Data subjects have a right to:

- (a) Request access to any data held about them by a data controller
- (b) Prevent the processing of their data for direct-marketing purposes
- (c) Ask to have inaccurate data amended
- (d) Prevent processing that is likely to cause damage or distress to themselves or anyone else.
- (e) Ask to have data erased once it is no longer necessary or irrelevant.

## **Personal Data Breaches**

All incidents in which personal data has been put at risk must be reported to the Office of the Data Protection Commissioner within 72 hours.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the BoM must communicate the personal data breach to the data subject without undue delay.

If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (BoM) without undue delay.

## **Dealing with a data access requests**

Under Article 13 and 14 of the GDPR, you have a right to be informed as to how your personal data is being processed. Under Article 15 of the GDPR, you have a right to obtain a copy, of any information relating to you kept on computer or in a structured manual filing system or intended for such a system by any organisation. All you need to do is put your request in writing to the Board of Management

You may be asked to provide evidence of your identity. This is to make sure that personal information is not given to the wrong person.

Our school will be obliged to respond to your access request within one month of receiving the request. In certain limited circumstances, the one month period may be extended by two months (taking into account the complexity of the request and the number of requests). Where our school is extending the period for replying to your

request, it must inform you of any extension, and the reason(s) for the delay in responding, within one month of receiving the request.

There is no fee payable by you to make an access request - the organisation must deal with your request for free. However, where the organisation believes a request is manifestly unfounded or excessive (for example where an individual makes repeated unnecessary access requests), the organisation may either charge a fee taking into account its administrative costs in dealing with the request(s), or refuse to act on the request(s). The burden of demonstrating why a request is manifestly unfounded or excessive rests on the organisation.

### **Exceptions to the right of access**

The Data Protection Act 2018 sets out some limited circumstances in which an organisation may not be required to provide you with a copy of your personal data. In particular, an organisation may be exempt from providing you with personal data if a restriction of your right of access is necessary:

- to safeguard cabinet confidentiality, judicial independence and court proceedings, parliamentary privilege, national security, defence and the international relations of the State
- for the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal penalties
- in contemplation of or for the establishment, exercise or defence of, a legal claim, prospective legal claim, legal proceedings or prospective legal proceedings whether before a court, statutory tribunal, statutory body or an administrative or out-of-court procedure
- in respect of damages, compensation or other liabilities or debts related to the claim, or
- For the purposes of estimating the amount of the liability of an organisation on foot of a claim for the payment of a sum of money, whether in respect of damages or compensation, in any case in which the application of those rights or obligations would be likely to prejudice the interests of the organisation in relation to the claim.

In addition, an organisation may not be required to provide you with a copy of your personal data where the data consists of an expression of opinion about you by another person given in confidence, or on the understanding that it would be treated as confidential, to a person who has a legitimate interest in receiving the information. GDPR also provides that the right to obtain a copy of your personal data must not adversely affect the rights and freedoms of others. For example, when responding to an

access request, an organisation should not provide the requestor with personal data relating to a third party that would reveal the third party's identity.

## **Implementation arrangements, roles and responsibilities**

In our school the Board of Management is the data controller and the principal will be assigned the role of co-ordinating implementation of this Data Protection Policy and for ensuring that staff who handle or have access to *Personal Data* are familiar with their data protection responsibilities.

The following personnel have responsibility for implementing the Data Protection Policy:

<b>Name</b>	<b>Responsibility</b>
Board of management:	Data Controller
Principal:	Implementation of Policy
Teaching personnel:	Awareness of responsibilities
Administrative personnel:	Security, confidentiality
IT personnel:	Security, encryption, confidentiality

## **Ratification and Communication**

This policy was updated in September 2025 to reflect current practice in Cabra Central School. It was ratified at a BOM meeting and signed by Chairperson. Secretary recorded the ratification in the Minutes of the meeting. This policy is on the school's website and available from the school's office on request.

Signed: \_\_\_\_\_

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