



Special School for Children with Autism and Complex Needs

Abacas Special School Kilnamanagh Data Protection Policy

Introduction

The school's Data Protection Policy applies to the personal data held by the school, which is protected by the Data Protection Acts 1988 and 2003.

This 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 the 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.

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 and 2003, 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/settings. 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 individual 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.
- **Keep data 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.
- **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 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



Special School for Children with Autism and Complex Needs

laptops) are encrypted and password-protected before they are removed from the school premises. Confidential information will be stored securely and, in relevant circumstances, will be placed in a separate file that 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. Once informed, the school will make all necessary changes to the relevant records. The Principal may delegate such updates/amendments to another member of 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 should be dated and signed by the person making that change.
- **Ensure that data is adequate, relevant and not excessive:** Only the necessary amount of information required to provide an adequate service will be gathered and stored.
- **Retain data 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 period 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. For further information, see the section "Give a copy of their personal data to that individual on request" set out below.

Purpose of this 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 in meeting its statutory obligations, to explain those obligations to school staff and to inform staff, students and their parents/guardians how their data will be treated.



Special School for Children with Autism and Complex Needs

To whom does the policy apply?

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 school handles or processes their personal data in the course of their dealings with the school.

Glossary

In order to properly understand the school's obligations, there are some key terms that should be understood by all relevant school staff:

Data means information in a form that can be processed. It includes both *automated data* (e.g. electronic data) and *manual data*. Automated data means any information on computer or information recorded with the intention that it be processed by computer. Manual data means information that is kept/recorded as part of a relevant filing system or with the intention that it forms part of a relevant filing system.

Relevant filing system means any set of information that, while not computerised, is structured by reference to individuals or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily, quickly and easily accessible.

Personal data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller, i.e. the school.

Sensitive personal data refers to personal data regarding a person's

- racial or ethnic origin, political opinions or religious or philosophical beliefs
- membership of a trade union
- physical or mental health or condition or sexual life
- commission or alleged commission of any offence or
- any proceedings for an offence committed or alleged to have been committed by the person, the disposal of such proceedings, or the sentence of any court in such proceedings, criminal convictions or the alleged commission of an offence.

Rationale

Why is a Data Protection Policy necessary? 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. 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



Special School for Children with Autism and Complex Needs

retention of this data, the challenge of meeting the school's legal responsibilities has increased. In the absence of a documented policy, there is a risk that data entrusted to the school will be retained, used or disclosed in ways that breach individuals' data protection rights. ABACAS takes its responsibilities under data protection law very seriously, and wishes to put in place safe practices to safeguard individuals' 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 ensuring 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 should take account of 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.
- 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 (from 1st January 2014 known as TUSLA), 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).



Special School for Children with Autism and Complex Needs

- 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 pupils attending the school) to be given to a health authority who has served a notice on it of a 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 - CPA (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

Relationship to characteristic spirit of the school (school’s mission/vision/aims)

ABACAS Special School seeks to

- enable each student to develop their full and unique potential
- provide a safe and secure environment for learning
- promote respect for the diversity of values, beliefs, traditions, languages and ways of life in society.

We aim to achieve these goals while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us. The school wishes to achieve these aims/missions while fully respecting individuals’ right to privacy and rights under the Data Protection Acts.



Special School for Children with Autism and Complex Needs

The *personal data* records held by this school may include:

A. Staff records:

- (a) **Categories of staff data:** As well as existing members of staff (and former members of staff), these records may also relate to applicants applying for positions within the school, trainee teachers and teachers under probation. These staff records may include:
- Name, address and contact details, PPS number
 - Original records of application and appointment (including application forms, interview marking schemes and other documents relating to recruitment and selection, such as references, Garda vetting outcomes and Medmark assessments)
 - Record of appointments 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 complaints and/or grievances, including consultations or competency discussions, action/ improvement/ evaluation plans and record of progress
 - 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 mandatory reporting legislation and/or child-safeguarding guidelines (subject to DES Child Protection Procedures)
 - Records pertaining to Droichead (induction for newly qualified teachers) and certificates of attendance at CPD.
 - “Pre-Return to Work (RTW)” forms to comply with government public health guidelines relating to the COVID-19 pandemic.
- (b) **Purposes:** Staff records are kept for the purposes of:
- the management and administration of school business (now and in the future)
 - facilitating 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)
 - facilitating pension payments in the future
 - human resource management, including reviewing performance and addressing performance-related issues
 - recording promotions made (documentation relating to promotions applied for) and changes in responsibilities, etc.
 - enabling 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)



Special School for Children with Autism and Complex Needs

- 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, the National Education Welfare Board, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies
 - for compliance with legislation relevant to the school
 - for compliance with public health guidelines relating to the COVID-19 pandemic.
- (c) **Location:** Records pertaining to staff are held in a secure, locked filing cabinet in the Principal's office.
- (d) **Security:** A staff member's manual records are kept within a filing system in a locked filing cabinet. Files that are created/received digitally are stored on a password-protected drive with an appropriate level of firewall software.

B. Student records:

- (a) **Categories of student data:** These may include information that 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)
 - names and contact details of a third adult to be provided to the school in line with COVID-19 policy, to facilitate the collection of a sick child from school should their parents/guardians be unavailable.
 - 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 and/or whether the student requires English language support
 - 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).
 - academic record –class assignments, assessment results as recorded on official school reports



Special School for Children with Autism and Complex Needs

- whether the student is exempt from studying Irish
- 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).
- “Pre-Return to School” questionnaires to comply with government public health guidelines relating to the COVID-19 pandemic.

(b) **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 support the provision of religious instruction
- to enable parents/guardians to be contacted in 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 for us in visual schedules/social stories, celebrate school achievements, establish a school website, record school events, and to keep a record of the history of the school.
- 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, the National Education Welfare Board, the HSE and other schools, etc. in compliance with law and directions issued by governmental departments
- to furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years), documentation/information/ references to third-level educational institutions and/or prospective employers
- for compliance with public health guidelines relating to the COVID-19 pandemic.
- In respect of a work experience placement, (where that work experience role requires that the student be Garda vetted), the school will assist the student in obtaining their Garda vetting outcome (with the consent of the student and their parent/guardian) in order to furnish a copy of same (with the consent of the student and the student’s parent/guardian) to the work experience employer.

(c) **Location:** Records pertaining to pupils are held in a secure, locked filing cabinet in the Principal’s office.



Special School for Children with Autism and Complex Needs

(d) **Security:** A pupil's manual records are kept within a filing system in a locked filing cabinet. Files which are created/received digitally are stored on a password protected drive with an appropriate level of firewall software.

(e) **Safeguards to ensure that confidential student data is disclosed to the correct parties:**

Any confidential documents pertaining to a student (IEP, clinical reports, etc.) must be either presented in person to one or both of the child's parents/guardians or posted to the child's home address, as notified to the school at the start of the year. Confidential documents will not be sent home in a child's school bag.

To ensure that the correct document is sent to the correct parents/guardians, staff will apply the four-eyes principle, i.e. the class teacher and one other staff member will together ensure that the correct document is put in an envelope addressed to the correct parents/guardians. The school's postal address will be stamped on the back of the envelope.

C. Board of Management records:

(a) **Categories of Board of Management data:** These may include:

- 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 particular individuals.

(b) **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

(c) **Location:** Records pertaining to the Board of Management are held in a secure, locked filing cabinet in the Principal's office.

(d) **Security:** The Board of Management's manual records are kept within a filing system in a locked filing cabinet. Files which are created/received digitally are stored on a password protected drive with an appropriate level of firewall software.

D. Other records:

The school will hold other records relating to individuals. The format in which these records will be kept are: manual record (personal file within a relevant filing system) and computer record (database). Some examples of the types of other records that the school will hold are set out below (this list is not exhaustive):



Special School for Children with Autism and Complex Needs

Creditors

- (a) **Categories of creditor data:** the school may hold some or all of the following information about creditors (some of whom are self-employed individuals):
- name
 - address
 - contact details
 - PPS number
 - tax details
 - bank details and
 - amount paid.
- (b) **Purposes:** This information is required for routine management and administration of the school's financial affairs including the payment of invoices, the compiling of annual financial accounts and complying with audits and investigations by the Revenue Commissioners.
- (c) **Location:** in a secure cabinet in the Secretary's office.
- (d) **Security:** Manual records are stored and locked away in the Secretary's office.

Charity tax-back forms

- (a) **Categories of data:** the school may hold the following data in relation to donors who have made charitable donations to the school:
- name
 - address
 - telephone number
 - PPS number
 - tax rate
 - signature and the gross amount of the donation.
- (b) **Purposes:** Schools are entitled to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY2) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation. The information requested on the appropriate certificate is the parents name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the school in the case of audit by the Revenue Commissioners.
- (c) **Location:** in a secure filing cabinet in the Secretary's office.



Special School for Children with Autism and Complex Needs

- (d) **Security:** Manual records are stored and locked away in the Secretary's office.

CCTV Images/Recordings

- (a) **Categories of data:** CCTV is installed on St. Kevin's premises. Cameras are installed externally, covering the carpark, St. Kevin's playground areas and the ABACAS front entrance at reception. These CCTV systems may record images of staff, students and members of the public who visit the premises.
- (b) **Purposes:** Safety and security of staff, students and visitors and to safeguard school property and equipment.
- (c) **Location:** Cameras are located externally as detailed in St. Kevin's CCTV policy. The viewing station is located in the Principal's office of St. Kevin's, from whom we rent the premises.
- (d) **Security:** Access to images/recordings is restricted to the Principal & deputy Principal of each school. Recordings are retained for no more than 28 days, except if required for the investigation of an incident. In general recordings are over-written automatically by the DVR within 10 days. Images/recordings may be viewed or made available to An Garda Síochána pursuant to section 8 Data Protection Acts, 1988 and 2003.

Contact-Tracing Log

- (a) **Categories of data:** A contact-tracing log will be maintained by the School Secretary for individuals (other than staff and pupils) entering and exiting the school building. Each visitor will complete a form that includes the following information:
- name
 - address
 - telephone number
 - e-mail address
 - date of visit
 - who they met with in school and purpose of visit
- (b) **Purpose:** The purpose of the contact-tracing log is to facilitate the HSE's official contact-tracing procedures and to act as a memory aid for employees in providing relevant information relating to close contacts in the event of a COVID-19 diagnosis.
- (c) **Location:** The contact-tracing log will be stored in the Secretary's office.



Special School for Children with Autism and Complex Needs

- (d) **Security:** Access to the contents of the contact tracing log will be restricted to the Principal, Deputy Principal, the School Secretary and Public Health officials in the event of a COVID-19 diagnosis. Each individual form will be retained for as long as considered necessary for this purpose.

Links to Other Policies and to Curriculum Delivery

School policies need to be consistent with one another, within the framework of the overall School Plan. Relevant school policies already in place, being developed or reviewed, should be examined with reference to the data protection policy and any implications which it has for them should be addressed.

The following policies may be among those considered:

- Child Protection Policy
- Anti-Bullying Policy
- Code of Behaviour
- Mobile Phone Code
- Admissions/Enrolment Policy
- CCTV Policy
- Substance Use Policy
- ICT Acceptable Usage Policy
- ABACAS COVID-19 Response Plan

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:

- Request access to any data held about them by a data controller
- Prevent the processing of their data for direct-marketing purposes
- Ask to have inaccurate data amended
- Prevent processing that is likely to cause damage or distress to themselves or anyone else.

Dealing with a data access request

Under Section 3 of the Data Protection Acts, an individual has the right to be informed whether the school holds data/information about them and to be given a description of the data together with details of the purposes for which their data is being kept. An individual can request only personal data pertaining to them. The individual must make this request **in writing** using the attached form (Appendix B), and the data controller will accede to the request within 21 days. Data Controllers may request an extension of this time in certain circumstances.



Special School for Children with Autism and Complex Needs

The right under Section 3 must be distinguished from the much broader right contained in Section 4, where individuals are entitled to a copy of their data.

Individuals are entitled to a copy of their personal data on written request.

- The individual is entitled to a copy of their personal data (subject to some exemptions and prohibitions set down in Section 5 of the Data Protection Act)
- Request must be responded to within 40 days
- Fee may apply for excessive or repetitive requests but cannot exceed €6.35
- Where a subsequent or similar request is made soon after a request has just been dealt with, it is at the discretion of the school as data controller to comply with the second request (no time limit but reasonable interval from the date of compliance with the last access request). This will be determined on a case-by-case basis.
- No personal data can be supplied relating to another individual unless that third party has consented to the disclosure of their data to the applicant. Data will be carefully redacted to omit references to any other individual and only where it has not been possible to redact the data to ensure that the third party is not identifiable would the school refuse to furnish the data to the applicant.

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.

Release of information

In the case of *Sensitive Personal Data*, explicitly given consent is required unless consent may be implied to be given, for example where it is necessary:

- urgently to prevent injury or other damage to the health of a person or to prevent serious loss or damage to property
- for the purpose of obtaining legal advice or in the course of legal proceedings in which the person doing the processing is a party or witness
- required by or under any enactment or by a rule of law or court order.



Special School for Children with Autism and Complex Needs

Breach of Information

The Data Protection Commissioner has published [National Data Breach Notification Form](#) which is to be used by all organisations reporting a Data Breach to the Data Commissioner. A data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to data. A Data Controller (Board of Management) must report a Data Breach to the Data Protection Commissioner's Office within 72 hours of its occurrence. The Data Controller must also inform all Data Subjects directly if any of their personal data has been breached.

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:

Name	Responsibility
Board of Management:	Data Controller
Principal:	Implementation of Policy
Teaching personnel:	Awareness of responsibilities
Administrative personnel:	Security, confidentiality
IT personnel:	Security, encryption, confidentiality

Ratification & communication

When the Data Protection Policy has been ratified by the Board of Management, it becomes the school's agreed Data Protection Policy. It should then be dated and circulated within the school community. The entire staff must be familiar with the Data Protection Policy and ready to put it into practice in accordance with the specified implementation arrangements. It is important that all concerned are made aware of any changes implied in recording information on students, staff and others in the school community.

Parents/guardians and students should be informed of the Data Protection Policy from the time of enrolment of the student e.g. by including the Data Protection Policy as part of the Enrolment Pack, by either enclosing it or incorporating it as an appendix to the enrolment form.



Special School for Children with Autism and Complex Needs

Monitoring the implementation of the policy

The implementation of the policy shall be monitored by the Principal and a sub-committee of the Board of Management.

At least one annual report should be issued to the Board of Management to confirm that the actions/measures set down under the policy are being implemented.

Reviewing and evaluating the policy

The policy should be reviewed and evaluated at certain pre-determined times and as necessary. On-going review and evaluation should take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB), legislation and feedback from parents/guardians, students, school staff and others. The policy should be revised as necessary in the light of such review and evaluation and within the framework of school planning.

Signed:

For and on behalf of the Board of Management

Date: 4th November 2021



Special School for Children with Autism and Complex Needs

Appendix A – Data Retention Periods for schools

<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 Pre-Return to School form (COVID-19)	Indefinitely Hold until pupil is 25 years Never destroy Hold until pupil is 25 years Indefinitely Indefinitely Indefinitely Indefinitely Indefinitely Indefinitely Hold until pupil returns to school
<i>Interview Records</i>	
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 being taken.
<i>Staff Records</i>	
Contract of Employment Teaching Council Registration Vetting Records Accident/Injury at work Reports Pre-Return to Work (RTW) form (COVID-19)	Retention for duration of employment + 7 years. Hold until employee returns to school
<i>BoM Records</i>	
BOM Agenda and Minutes CC TV Recordings Payroll & Taxation Invoices/receipts Audited Accounts COVID-19 Contact Tracing Log	Indefinitely 28 days normally. In the event of criminal investigation – as long as is necessary Revenue require a 6-year period after the end of the tax year Retain for 7 Years Indefinitely For as long as is necessary for the purpose



Special School for Children with Autism and Complex Needs

Appendix B – Personal Data Access Request Form

*Request for a copy of **Personal Data** under the Data Protection Acts 1988 to 2018*

Important: Proof of Identity must accompany this Access Request Form (e.g. official/State photographic identity document such as driver's licence, passport).

Full Name:	
Maiden Name (if applicable):	
Address:	
Contact number *	Email address *

* We may need to contact you to discuss your access request.

Please tick the box that applies to you:

Parent/ Guardian of current Pupil <input type="checkbox"/>	Former Pupil <input type="checkbox"/>	Current Staff Member <input type="checkbox"/>	Former Staff Member: <input type="checkbox"/>
--	---	---	---

Name of Pupil:		Date of Birth of Pupil:	
Insert year of leaving:		Insert years From/To:	

I, [name] wish to make an Access Request for a copy of personal data that ABACAS SPECIAL SCHOOL holds about me/my child. I am making this access request under the Data Protection Acts 2013 to 2018



Special School for Children with Autism and Complex Needs

To help us to locate your personal data, please provide details below that will assist us to meet your requirements, e.g. a description of the category of data you seek.

Any other information relevant to your access request:

This **Access Request** must be accompanied with a copy of photographic identification, e.g. passport or drivers licence. I declare that all the details I have given on this form are true and complete to the best of my knowledge.

Signature of Applicant Date:

Please return this form to the relevant address:

**Chairperson of Board of Management ABACAS SPECIAL SCHOOL, TREPARK ROAD,
KILNAMANAGH, DUBLIN 24, D24 A2X**



Special School for Children with Autism and Complex Needs

Website PRIVACY STATEMENT

ABACAS Special School, Kilnarnagh

Website of ABACAS Special School, Kilnarnagh

ABACAS Special School, Kilnarnagh is committed to preserving the privacy of all visitors to www.abacasspecialschool.ie (“our website”). This privacy statement relates to our practices in connection with our website. **ABACAS Special School, Kilnarnagh** fully respects your right to privacy. We will not collect personal information/personal data about you when you visit our website unless you choose to provide that information using the “Contact us” form. By using this form, you consent to the collection and use of your information under the terms of this privacy statement, which are in accordance with the Data Protection Acts, 1988 and 2003 and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011. Please read the following privacy statement to understand how we use and protect the information that you choose to provide to us.

Personal information that we collect from you

When you visit our website you may wish to provide certain information about yourself, such as when you complete our “Contact us” form. **ABACAS Special School, Kilnarnagh** does not collect any personal data about you on this website, apart from the information that you volunteer to send us in the “Contact us” form.

Non-Personal information that we collect

When you visit our website, certain non-personal data is available to us through our internet service provider. This non-personal data is collected on a statistical, aggregate, non-individual basis. This information may include the IP address from which you access our website, the type of device used to access our website (phone, computer, tablet etc.), the type of browser used to access our website (Internet Explorer, Firefox, etc.), the type of operating system used to access our website (Windows, Macintosh, etc.), the “top-level” domain name used (ie, .com, .org, etc.), the language of the device used to access our website, the date and time of your visit to our website and the number of pages you visited on our website.

Use of your information

Any information that you provide using the “Contact us” form is not made available to any third parties and is only used by **ABACAS Special School, Kilnarnagh** in line with the purposes for which you provided it (e.g. to contact you and answer any queries you have raised in the “Contact us” form or to address any other feedback you send us in the “Contact us” form) or for any reasonably incidental purpose.



Special School for Children with Autism and Complex Needs

Disclosure to Other People

We do not disclose, sell or distribute any personal information you send to us to any third parties. We may pass aggregate information on the usage of our site to third parties, but this will not include information that can be used to identify you. Your personal data may also be anonymised and used for statistical purposes. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Cookies

A cookie is a small file sent to your browser from a web server and stored on your computer's hard drive to identify you as the user of the website. Many internet sites use cookies.

Typically they are used by the website to identify the person accessing the website to track the person's use of the site and any repeat visits made by that person. **ABACAS Special School** does not use cookies to track users.

Your browser will give you the option of preventing websites using cookies, or deleting cookies that have been accepted from other sites. Your browser's help service or help manual will show you how this is done. If you do not want your browser to accept cookies, you can "turn off" the cookie acceptance setting on your browser setting. However you must note that this may stop some websites from working properly on your device.

Security

We employ security measures to protect your information from access by unauthorised persons and to guard against unlawful processing, accidental loss, destruction and damage, and we will do our best to ensure that all records we hold remain secure in line with our obligations under the Data Protection Acts, 1988 and 2003. We take our security responsibilities seriously, employing the most appropriate physical and technical measures, including staff training and awareness. We review our security procedures regularly.

Retention

We do not retain your personal data for longer than is necessary for us to comply with the purpose for which you gave it to us. Any personal data you provide to us using this website will be used in line with the purposes for which you provided it (e.g. to contact you and answer any queries you have raised in the "Contact us" form or to address any other feedback you send us in the "Contact us" form). After this purpose has been completed, we will delete your personal data.

Accessing Your Information

You are entitled to see the information we hold about you. On written request, we supply copies of your personal data that you may have supplied to us using our website. If you wish to obtain copies of this personal data, you should write to the Principal of **ABACAS Special School** and ask that she provide you with an Access Request Form. The law entitles us to charge you a fee for doing so (which currently does not exceed €6.35). Your request will be dealt with as soon



Special School for Children with Autism and Complex Needs

as possible and will not take more than 40 days to process. If you discover that **ABACAS Special School** holds inaccurate information about you, you can request that we correct that information. In certain circumstances, you may also request that data you have supplied via our website be deleted (although you should note that if you request a deletion, you would generally be expected to identify some contravention of data protection law in the manner in which **ABACAS Special School** processes the data concerned). Upon written request, we will supply you with a Data Rectification/Erasure Form for this purpose.

Contacting Us

If you are concerned about how your personal data is processed by our website, please do not hesitate to bring these concerns to our attention using the contact details below:

The Chairperson
ABACAS Special School
Treepark Road,
Kilnamanagh
D24 A2XF
Tel: 01-4599585