

Mount Temple Comprehensive School - Data Protection Policy

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D017 Results of in-school tests/exams (i.e. end of term, end of year exams, assessment results).	Confidential	Electronic: VS Ware	Fulfil processing of student records in the course of delivering education.	Public Interest. Legal Obligation.	Personal Data.	Administrators. Principal. Deputy Principals. Year Head. Parents / Guardians.	N/a	Up to 7 years after the student finishes / would have finished 6th Year (or sooner at School's discretion).	Paper Copies: Confidential shredding.	<p>Technical: Authentication by VS Ware System using username and password. Main Office Staff / Principal / Deputy Principals: Permission (Full Admin Rights); Student Profiles: Personal (Application Form); Household, Attendance, Term Reports, Timetable, Payments, Behaviour, Discipline, Docs, Notes, AEN, Classes & Groups, Medical, Account, Enrolment History. VS Ware use SSL/TLS protocol that provides secure communications for accessing and updating the record. Electronic Records are backed up periodically.</p> <p>Organisational: Offices are locked when not in use. Computers logged out when not in use. Paper records are filed and stored in secure locked cabinets to which only designated staff have access. Staff briefed on the Data Protection Policy.</p>
D018 End of term/year reports	Confidential	Electronic: VS Ware	Fulfil processing of student records in the course of delivering education.	Public Interest. Legal Obligation.	Personal Data.	Administrators. Principal. Deputy Principals. Year Head. Parents / Guardians.	N/a	Up to 7 years after the student finishes / would have finished 6th Year (or sooner at School's discretion).	Paper Copies: Confidential shredding.	<p>Technical: Authentication by VS Ware System using username and password. Main Office Staff / Principal / Deputy Principals: Permission (Full Admin Rights); Student Profiles: Personal (Application Form); Household, Attendance, Term Reports, Timetable, Payments, Behaviour, Discipline, Docs, Notes, AEN, Classes & Groups, Medical, Account, Enrolment History. VS Ware use SSL/TLS protocol that provides secure communications for accessing and updating the record. Electronic Records are backed up periodically.</p> <p>Organisational: Offices are locked when not in use. Computers logged out when not in use. Paper records are filed and stored in secure locked cabinets to which only designated staff have access. Staff briefed on the Data Protection Policy.</p>

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D019 Absences	Confidential	Electronic: VS Ware	Fulfil processing of student records in the course of delivering education.	Public Interest. Legal Obligation.	Personal Data.	Administrators. Principal. Deputy Principals. Year Heads. Parents / Guardians. Tusla.	N/a	Up to 7 years after the student finishes / would have finished 6th Year (or sooner at School's discretion).	Paper Copies: Confidential Shredding.	Technical: Authentication by VS Ware System using username and password. Main Office Staff / Principal / Deputy Principals; Permission (Full, Admin, Rights); Student Profiles; Personal (Application Form), Household, Attendance; Term Reports, Timetable, Payments, Behaviour, Discipline, Docs, Notes, AEN, Classes & Groups, Medical, Account, Enrollment History. VS Ware use SSL/TLS protocol that provides secure communications for accessing and updating the record. Electronic Records are backed up periodically. Organisational: Offices are locked when not in use. Computers logged out when not in use. Paper records are filed and stored in secure locked cabinets to which only designated staff have access. Staff briefed on the Data Protection Policy.
D020 Records of school tours/trips, including permission slips, itinerary reports.	Confidential	Paper: Teacher Organising the trip to provide these to the Deputy Principals's Office. Stored in locked and secure filing cabinets.	Fulfil processing of student records in the course of organising a school trip.	Public Interest. Legal Obligation.	Personal Data incl. Consent Forms.	Principal. Deputy Principals. Teachers. Tusla.	N/a	Overnight Trips: Up to 7 years after the student finishes / would have finished 6th Year (or sooner at School's discretion). Day Trips: 1 Month after the trip on condition that no accidents / incidents were reported.	Day Trip Paper Copies: Confidential Shredding.	Technical: Minimal Data including consent collected from the parent(s) / guardian(s) in order to book the trip. In some cases, when school trips are taken abroad student's will be asked to provide necessary information to a travel agent directly i.e. Name, Address, DOB, Passport Number where Data Processing Agreement is in place. Organisational: Copies of consent forms kept on file with teacher. Computers on which records are stored are password protected and are accessible only to designated staff.
D021 Garda vetting form & outcome - STUDENTS	Confidential	Paper: Principal's Office.	Fulfil processing of student records in the course of gaining work experience.	Public Interest. Legal Obligation.	Personal Data.	Placement Employer. Administrators. Teachers. Deputy Principals. Principal.	N/a	Record of outcome retained for 12 months.	Paper Copies: Confidential shredding.	Technical: Only processed for those over 16 years of age with the consent of a parent(s) / guardian(s). Organisational: School to retain the reference number and date of disclosure on file, which can be checked with An Garda Siochana in the future. Computers on which records are stored are password protected and are accessible only to designated staff.

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28. Sensitive Personal Data

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D022 Psychological assessments	Confidential	Paper: AEN Office.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Name, Surname, Results of Psychological Assessment.	AEN Coordinator, Additional Education Teachers, Administrators, Year Head, Deputy Principals, Principal.	N/a	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Technical: AEN Coordinator, SNAs & Senior Management have access to this information. Filing cabinet located in locked office. Organisational: Filing cabinets holding these records will be locked at the end of each day. Relevant employees briefed on the Data Protection Policy and the AEN Policy. Office is locked when not in use.
D023 Additional Education Needs' files, reviews, correspondence and Student Support Plans	Confidential	Paper: AEN Office.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Name, Surname, Results of Psychological Assessment, Reviews, correspondence and Student Support Plans.	AEN Coordinator, Additional Education Teachers, Administrators, Year Head, Deputy Principals, Principal.	N/a	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Technical: Only designated Staff & Senior Management have access to this information. Organisational: Filing cabinets holding these records will be locked at the end of each day. Relevant staff briefed on the Data Protection Policy and the AEN Policy. Office is locked when not in use.
D024 Student Support Plans	Restricted	Paper: AEN Office.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Name, Surname, Results of Psychological Assessment, Reviews, correspondence and Student Support Plans.	AEN Coordinator, Additional Education Teachers, Administrators, Year Head, Timetabled Teachers, Inspector, Deputy Principals, Principal, Parents / Guardians.	On server.	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Technical: Access to server restricted. External IT company maintaining the server and security. Only designated Additional Education Teachers, Class Teachers & Senior Management have access to this information. AEN Filing cabinet located in locked office. Organisational: Filing cabinets holding these records will be locked at the end of each day. Relevant employees briefed on the Data Protection Policy and the AEN Policy. Office is locked when not in use.
D025 Guidance Counselling Records	Confidential	Paper: Student's File with Guidance Counsellor in locked and secure filing cabinets.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Sensitive Personal Details.	Guidance Counsellor, External Counsellor.	N/a	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Technical: Data Processing Agreement in place with external counsellor. Organisational: Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Relevant staff briefed on the Data Protection Policy.

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D026 DAT	Confidential	Paper: Student's File with Guidance Counsellor in locked and secure filing cabinets.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Sensitive Personal Details.	Guidance Counsellor. CAT 4 Providers. In certain circumstances the appropriate people/agencies or authorities may be informed. The students are made aware of these conditions. Timetabled Teachers. Deputy Principals. Principal. Parents / Guardians.	N/a	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Organisational: Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Relevant staff briefed on the Data Protection Policy.
D027 Child Protection Records D028	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil our legal obligation under Child Protection Procedures for Primary and Post-Primary Schools 2017.	Legal Obligation.	Personal Data.	Principal (Designated Liaison Person). Deputy Principals (Deputy Designated Liaison Person). Board of Management.	N/a	Indefinitely but reviewed annually.	Paper Copies: Never Destroy.	Technical: All incidents are reported to the Principal (Designated Liaison Person) as per the Child Safeguarding Statement of the school. Principal's Office is locked when not in use. Organisational: Relevant staff briefed on the Data Protection Policy and the Child Safeguarding Statement.
D029 Section 29 appeal records	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Name, Surname, Address, Home Tel, Number, Daytime Tel, Number, Mobile Tel, Number, Date of Birth, Year / Class of Student, AEN Requirement, Nature of Decision, Particulars associated with the expulsion.	Principal. Board of Management.	N/a	Indefinitely but reviewed annually.	Paper Copies: Confidential Shredding.	Technical: All appeal records are reported to the Board of Management as per the Admissions Policy of the school. These records will be held in the Principal's Office which is locked when not in use. Organisational: Relevant staff briefed on the Data Protection Policy.
D030 Incoming 1 st Year Student Information	Confidential	Electronic: Google Workspace	Fulfil processing of student records in the course of delivering education.	Legal Obligation.	Personal Data incl. Name, Surname, Address, Home Tel, Number, Daytime Tel, Number, Mobile Tel, Number, Date of Birth, Year / Class of Student, AEN Requirement, Nature of Decision, Particulars associated with the expulsion.	Principal. Board of Management.	N/a	Up to 7 years after the student finishes / would have finished 6th Year (or sooner at School's discretion).	Deletion	Technical: Individual Logins for Staff. Authentication by using username and password. Access to Email over Encryption / Https / Tls. Tls is an industry-wide standard based on Secure Sockets Layer (SSL) technology that encrypts mail for secure delivery. Ssl/Tls protocol that provides secure communications on the internet for such things as web browsing, e-mail, instant messaging, and other data transfers. Backups are conducted regularly. Organisational: Relevant employees trained on GDPR awareness.

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D031 Accident Reports	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil processing of student records in the course of delivering education.	Public Interest. Legal Obligation.	Personal Data incl. Name, Surname, Address, Particulars associated with an incident.	Principal (Designated Liaison Person), Deputy Principals (Deputy Designated Liaison Person), Board of Management, Administrators, State Claims Agency, Insurance Company.	N/a	10 Years.	Paper Copies: Confidential Shredding.	Technical: Individual Logins for Staff. Authentication by G-Suite for Education using username and password. Access to Email over Encryption / Https / Tls. Tls is an industry-wide standard based on Secure Sockets Layer (SSL) technology that encrypts mail for secure delivery. SSL/TLS protocol that provides secure communications on the Internet for such things as web browsing, e-mail, instant messaging, and other data transfers. Backups are conducted regularly. Organisational: All incidents are reported to the Principal (Designated Liaison Person) as per the Child Safeguarding Statement of the school. Principal's Office is locked when not in use. Relevant staff briefed on the Data Protection Policy and the Health & Safety Policy.
D032 Enrolment /transfer forms where child is not enrolled or refused enrolment	Confidential	Paper: Main Office in locked and secure filing cabinets.	Fulfil processing of student records in the normal course of school operations.	Legal Obligation.	Student Data incl. Name, Surname, Date of Birth, PPS Number, Address, Parent(s) / guardian(s) Name, Parent(s) / guardian(s) Phone Number, Parent(s) / guardian(s) Home address, Mobile, Emergency Contact Person & No., Email, Nationality, Birth Certificate, Mothers Maiden Name, Family Members (current / past), Medical Card, Medical Conditions, Name, Address & Tel. No. of GP, Previous Educational History	Administrators, Principal, Deputy Principals.	N/a	12 Months.	Paper Copies: Confidential Shredding. VS Ware : Securely Delete Student Profile.	Technical: Individual Logins for Administrators. Authentication by Esinet P-Pods System using username and password. P-Pods use SSL/TLS protocol that provides secure comms for accessing and updating the record. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff trained on the admin of the Esinet software. Filing cabinets locked and secured when not in use. Staff briefed on the Data Protection Policy.
D033 Records of complaints made by parent(s) / guardian(s) / students	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil processing of student records in the normal admin of school operations.	Public Interest. Establishment, exercise or defence of legal claims.	Personal Data.	Principal, Deputy Principals, Those the subject of the complaint.	N/a	Depends entirely on the nature of the complaint.	If it is child-safeguarding, a complaint relating to teacher-handling, or an accident, then retain indefinitely. Otherwise Up to 7 years after the student finishes 6th Year. Confidential Shredding.	Technical: Paper records are filed and stored in secure locked cabinets to which only designated staff have access. Principal's Office is locked when not in use. Organisational: Staff briefed on the Data Protection Policy.

29. Recruitment Process Records (Unsuccessful Candidates)

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D034 Applications & CVs of candidates called for interview	Confidential	Paper: Principal's Office in locked and secure filing cabinets. Electronic: School email.	Recruitment activities of the school.	Unsuccessful Candidate Derence of Legal Claim. Successful Candidate Fulfillment of Contract.	Personal Data Incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Unsuccessful Candidate: 18 months from close of competition; 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken. Successful Candidate: Retain for duration of employment plus 7 years.	Paper Copies: Confidential Shredding. Electronic: Delete email.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D035 Database of applications										
D036 Selection Criteria										
D037 Applications of candidates not shortlisted										
D038 Unsolicited job applications										
D039 Candidates shortlisted but not successful										
D040 Interview board marking scheme and notes										
D041 Panel recommendation										

Note: these suggested retention periods apply to unsuccessful candidates only. They do NOT apply to successful candidates, or candidates who are/were also employees already within your school applying for another post/position, see retention periods set out below.

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D051 Job Specification / Description	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets.	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Retain for duration of employment plus 7 years.	Paper Copies: Confidential Shredding.	Technical: Computers on which records are stored are password protected and are accessible only to designated staff. Electronic Records are backed up periodically. Organisational: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day.
D052 Contract/ Conditions of employment										
D053 Probation letters/forms										
D054 POR applications & correspondence (whether successful or not)										
D055 Leave of absence applications										
D056 Job Share										
D057 Career Break										
D058 Maternity / Paternity Leave	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Retain for 2 years following retirement /resignation or the duration of employment plus 7 years (whichever is the greater).	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Authentication by Esinet system using user-name and password. Esinet use SSL/TLS protocol that provides secure communications for accessing and updating the record. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D059 Parental Leave	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Must be kept for 8 years - Parental Leave Act 1998 Retain for 8 years or the duration of employment plus 7 years.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Authentication by Esinet System using user-name and password. Pods use SSL/TLS protocol that provides secure communications for accessing and updating the record. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.

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D060 Force Majeure Leave	Confidential	Paper: Teacher's File in Principals' Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms, CV, Name, Address, Qualifications, Teaching Council Number, Email, Career History.	Administrators, Principal, Deputy Principals.	N/a	Retain for 8 years or the duration of employment plus 7 years (whichever is the greater). There is a statutory requirement to retain for 8 years.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Authentication by Esinet System using user-name and password. P-Pods use SSL/TLS protocol that provides secure communications for accessing and updating the record. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D061 Carer's Leave	Confidential	Paper: Teacher's Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms, CV, Name, Address, Qualifications, Teaching Council Number, Email, Career History.	Administrators, Principal, Deputy Principals.	N/a	Must be kept for 8 years - Carer's Leave Act 2001 Retain for 8 years or the duration of employment plus 7 years (whichever is the greater).	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Authentication by Esinet system using user-name and password. P-Pods use SSL/TLS protocol that provides secure communications for accessing and updating the record. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D062 Working Time Act (attendance hours, holidays, breaks)	Confidential	Paper: Teacher's File in Principals' Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms, CV, Name, Address, Qualifications, Teaching Council Number, Email, Career History.	Administrators, Principal, Deputy Principals.	N/a	Retain for duration of employment plus 7 years	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Authentication by Esinet System using user-name and password. P-Pods use SSL/TLS protocol that provides secure communications for accessing and updating the record. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.

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D063 Allegations / Complaints relating to a member of staff (made by management, a colleague, student, parent(s) / guardian(s)).	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets.	HR activities of the school.	Public Interest: Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals. Those the subject of the complaint.	N/a	Retain for duration of employment plus 7 years Please note the relevant: DES Circular re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D064 Grievance and Disciplinary records	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets.	HR activities of the school.	Public Interest: Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals. Board of Management.	N/a	Retain for duration of employment plus 7 years Please note the relevant: DES Circular re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.

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31. Occupational Health Records

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D065 Sickness Absence Records / Certificates	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Retain for 7 years unless sickness absence relates to an accident / injury / incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.	<p>Paper Copies: Confidential Shredding unless sickness absence relates to an accident / injury / incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.</p> <p>Organisational: Office is locked when not in use. Relevant staff trained on the admin of the ESINET system. Staff briefed on the Data Protection Policy.</p>	
D066 Pre-Employment Medical Assessment										
D067 Occupational Health Referral										
D068 Correspondence regarding retirement on ill-health grounds										
D069 Accident / Injury at Work Reports	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Indefinitely. Pending Review by the BoM.	<p>Technical: Do not destroy.</p> <p>Organisational: Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff.</p> <p>Organisational: Relevant staff briefed on the Data Protection Policy.</p>	

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D070 Medical assessments or referrals regarding fitness for work	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Retain for duration of employment plus 7 years There is a statutory requirement to retain for 3 years.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Filing cabinets holding these records will be locked at the end of each day. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Relevant staff briefed on the Data Protection Policy.
D071 Sick Leave Records (Sick Benefit Forms)	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Retain for duration of employment plus 7 years There is a statutory requirement to retain for 3 years.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Individual Logins for OCLs. Esinet System authenticates using username and password. Esinet uses SSL/TLS protocol that provides secure communications for updating the record. Computers on which records are stored are password protected and are accessible only to designated staff. Organisational: Office is locked when not in use. Relevant staff trained on the admin of the ESINET system. Staff briefed on the Data Protection Policy.

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32. Superannuation / Pension / Retirement Records

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D072 Records of previous service (incl. correspondence with previous employers)	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Indefinitely. Pending Review by the BoM.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D073 Pension Calculation	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Indefinitely. Pending Review by the BoM.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D074 Pension Increases	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Duration of employment + 7 years or for the life of employee/former employee plus + 7 years - whichever is the longer.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D075 Salary Claim Forms	Confidential	Paper: Teacher's File in Principal's Office in locked and secure filing cabinets. Electronic: Esinet	HR activities of the school.	Public Interest. Fulfilment of Contract. Defence of Legal Claim.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Duration of employment + 7 years or for the life of employee/former employee plus + 7 years - whichever is the longer.	Paper Copies: Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.

Mount Temple Comprehensive School - Data Protection Policy

33. Government Returns

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D076 Any returns which identify individual staff/pupils.	Confidential	<p>Paper: Principal's Office in locked and secure filing cabinets.</p> <p>Electronic: VS Ware</p>	Fulfill processing of student records in the normal admin of school operations.	Public Interest, Fulfillment of Contract, Defence of Legal Claim.	<p>Personal Data incl. Application Forms, CV, Name, Address, Qualifications, Teaching Council Number, Email, Career History.</p>	<p>Administrators, Principal, Deputy Principals, Teachers.</p>	N/a	<p>Depends upon the nature of the return. If it relates to pay/pension / benefits of staff, keep indefinitely as per DES guidelines.</p> <p>If it relates to information on students, e.g. October Returns, Annual Census etc., keep in line with "Student Records" guidelines above.</p>	<p>Paper Copies: Confidential Shredding.</p>	<p>Technical: Authentication by Compass System using username and password. Main Office Staff / Principal / Deputy Principals; Permission (Full Admin Rights); Compass use - SSL/TLS protocol that provides secure communications for accessing and updating the record. Electronic Records are backed up periodically. Computers are password protected and are only accessible by designated staff.</p> <p>Organisational: Only the minimum data is collected from the data subject to fulfil our processing needs. Office is locked when not in use. Staff briefed on the Data Protection Policy.</p>

Mount Temple Comprehensive School - Data Protection Policy

34. Board of Management Meeting Records

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D077 Board agenda and minutes	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil good governance and running of the school in the Public Interest.	Public Interest. Defence of Legal Claim.	Student Personal Data. Staff Personal Data.	Board of Management. Principal. Deputy Principals.	N/a	Indefinitely.	Do Not Destroy	<p>Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Desktop computer is encrypted. Office is locked when not in use.</p> <p>Organisational: BOM Minutes and records are kept secure in locked filing cabinets at all times. Electronic versions of BOM Minutes are kept secure in password protected folders. Minutes that identifies vulnerable persons or particularly sensitive data is anonymized where possible. BOM minutes are only distributed in paper copy and taken back following the completion of a meeting. Where emailed, the minutes will be password protected and sent to a school email address. Minutes are kept secure at all times and that the information is shredded as soon as could be reasonably expected. Relevant board members & employees briefed on the Data Protection Policy.</p>
D078 School Closure / Amalgamation Records	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Fulfil good governance and running of the school in the Public Interest.	Public Interest. Defence of Legal Claim.	Student Personal Data. Staff Personal Data.	Board of Management. Senior Management. Trustees.	N/a	On school closure, records should be transferred as per Records Retention Policy in the event of school closure / amalgamation. A de-commissioning exercise should take place with respect to archiving and recording data.	Do Not Destroy	<p>Technical: Computers on which records are stored are password protected and are accessible only to designated staff.</p> <p>Organisational: Former student and staff files – to be returned to trustees. Appropriate measures established for former students and staff accessing these records.</p>

Mount Temple Comprehensive School - Data Protection Policy

35. Other School Based Reports / Minutes

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D079 Principal's report including staff absences	Confidential	Electronic: Principal's Office	Fulfill good governance and running of the school in the Public Interest.	Public Interest, Defence of Legal Claim.	Student Personal Data. Staff Personal Data.	Department of Education & Skills. Principal. Deputy Principals.	N/a	Indefinitely. Pending Review by the BoM.	Do Not Destroy.	<p>Technical: Computers on which records are stored are password protected and are accessible only to designated staff. Principal's Office is locked when not in use.</p> <p>Organisational: Relevant staff briefed on the Data Protection Policy. Administrative log and does not relate to any one employee in particular: the monthly reports are not structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible. Not a "relevant filing system".</p>

Mount Temple Comprehensive School - Data Protection Policy

36. Financial Records

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D080 Audited Accounts	Confidential	Paper: Accounts Office in locked and secure filing cabinets. Electronic: Sage	School Financial Accounts & Reporting	Public Interest, Legal Obligation.	Board of Management Signatories.	Trustee, FSSU, Board of Management, Principal, Revenue Commissioner.	N/a	Indefinitely, Pending Review by the BoM.	Do Not Destroy.	Technical: Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained indefinitely within the school. These records can be kept either on a manual or computer system. Organisational: Access to Financial Records is limited to authorised personnel i.e. Principal / Deputy Principals, Administrators.
D081 Payroll and Taxation	Confidential	Paper: Accounts Office in locked and secure filing cabinets. Electronic: Sage	Process Payroll & Taxation.	Public Interest, Legal Obligation, Contractual Obligation.	Staff Personal Data incl. Name, PPSN, Address, Tax Credits.	Principal, Deputy Principals, Revenue Commissioner.	N/a	Indefinitely, Pending Review by the BoM.	Do Not Destroy.	Technical: Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained indefinitely within the school. These records can be kept either on a manual or computer system. Organisational: Access to Financial Records is limited to authorised personnel i.e. Principal & Administrators.
D082 Invoices / Back Up Records / Receipts	Confidential	Paper: Accounts Office in locked and secure filing cabinets. Electronic: Sage	School Financial Accounts & Reporting	Public Interest, Legal Obligation, Contractual Obligation.	Vendor Information.	Principal, Deputy Principals, Revenue Commissioner.	N/a	7 years.	Confidential Shredding.	Technical: Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained indefinitely within the school. These records can be kept either on a manual or computer system. Organisational: Access to Financial Records is limited to authorised personnel i.e. Principal / Deputy Principals, Administrators.

37. Promotion Process Records

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D083 Posts of Responsibility	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Promotion Process of the school.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Indefinitely.	Do Not Destroy.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D084 Calculation of Service	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Pension Admins.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Administrators. Principal. Deputy Principals.	N/a	Indefinitely.	Do Not Destroy.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D085 Promotions/POR Boards Master Files	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Promotion Process of the school.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Indefinitely.	Do Not Destroy.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.

Mount Temple Comprehensive School - Data Protection Policy

Dataset	Classification	Location Stored	Purpose of Processing	Lawful Basis for Processing	Categories of Personal Data	Categories of Recipients	Safeguards (Transfer to 3 rd Countries)	Max. Data Retention Period	Final Disposal	Description of Technical and Organisational Security Measures
D086 Promotions/POR Boards assessment report files	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Promotion Process of the school.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	18 months.	Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D087 POR Appeal Documents	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Promotion Process of the school.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	Retain original on personnel file and copy of master & appeal file. Retain for duration of employment + 7 years. Copy on master and appeal file.	Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.
D088 Correspondence from candidates re feedback	Confidential	Paper: Principal's Office in locked and secure filing cabinets.	Promotion Process of the school.	Public Interest. Fulfilment of Contract.	Personal Data incl. Application Forms. CV. Name. Address. Qualifications. Teaching Council Number. Email. Career History.	Principal. Deputy Principals.	N/a	If feedback is from unsuccessful candidate who is not an employee within the school, keep in line with retention periods in Staff Records above. If feedback is from successful candidate or from unsuccessful candidate who is already an employee within the school, keep in line with "Staff personnel while in employment" above.	Confidential Shredding.	Technical: Only the minimum data is collected from the data subject to fulfil our processing needs. Computers are password protected and are only accessible by designated staff. Organisational: Office is locked when not in use. Staff briefed on the Data Protection Policy.

38. Data Protection Communications – Data Protection Policy



- This document will be made known to all employees and staff as the primary source of Data Privacy Policy at Mount Temple Comprehensive School.
- Employees and contractors will be formally notified of Mount Temple Comprehensive School's position with respect to this policy via a staff briefing.

39. Data Protection Communications – Privacy Notices



Mount Temple Comprehensive School's main method of informing data subjects and the general public regarding our use of their data is the Privacy Notice. The Privacy Notice will include at a minimum:

- Identification of Mount Temple Comprehensive School as the controller of personal data.
- A description of the personal data we hold and use.
- An explanation of what we use the information for.
- Who we share the information with.
- Where we store the information.
- How long we keep the information.
- A summary of the data subjects' rights as observed by Mount Temple Comprehensive School.
- Summary technical details regarding information processing (including cookie use).

The Data Privacy Notice will be formatted appropriately for the medium in which it is published. The Data Privacy Notice is considered an advisory notice regarding Mount Temple Comprehensive School policy and is not intended to constitute a contract with any person.



40. Data Protection Communications – Website Privacy Notice



Mount Temple Comprehensive School's main method of informing data subjects and the general public regarding its use of their data whilst on our website will be the Website Privacy Notice. The Privacy Notice will include at a minimum:

- Identification of Mount Temple Comprehensive School as the data controller.
- A description of the personal data we hold and use.
- An explanation of what we use the information for.
- Who we share the information with.
- Where we store the information.
- How long we keep the information.
- A summary of the data subject's rights.
- Summary technical details regarding information processing (including cookie use).

41. Communication Plan for Privacy Notices



- Mount Temple Comprehensive School will ensure that staff and external parties are informed regarding our use of their data. Any subsequent changes to our policy or practices which affect how user's data is processed will be communicated as per this section.
- Employees will be informed directly by email informing of the change, and with attachments or links to supplementary information where required.
- Mount Temple Comprehensive School's main vehicle for informing the public of our privacy policy is the data privacy notice which is published on our website. This will be revised as necessary to ensure compliance.
- Where certain classes of users (e.g. parent(s) / guardian(s) of students) need to be informed more proactively regarding our use of their personal data, we will accomplish this by direct email to those users. This will be carried out in advance of the change going live. Where a change of use requires a response, the lack of a response will not be treated as acceptance.
- From time to time it will be necessary to revise the Data Protection Policy as well as associated Privacy Notice in response to changes in regulations or evolution of expectations for compliance.
- The Privacy Notice itself contains an advisory to users to check regularly for changes.

42. Third Parties – Data Processors



Mount Temple Comprehensive School avails of the services of outside parties who act as Data Processors on our behalf to assist us in essential school processes. These include but are not limited to software providers & IT contractors.

Mount Temple Comprehensive School will perform due diligence with respect to any and all such third parties and ensure that:

- The basis of the relationship is clearly defined and falls under Mount Temple Comprehensive School Data Protection Policy.
- A Data Processing Agreement is in place that strengthens our compliance with the GDPR.
- Where data held may not come under GDPR, that a non-disclosure agreement protects personal data.

Only providers who are actively involved in processing personal data will come under scrutiny.

43. Third Parties – Transfers of Personal Data to non-EEA jurisdictions



Our use of third parties may include entities outside the EU/EEA who will process personal data of EU residents on our behalf in the direct exercise of our key organisational processes. Mount Temple Comprehensive School warrants that the use of non-EEA services is an organisational necessity.

Mount Temple Comprehensive School has identified the following Processors and the adequacy arrangements in place to ensure that these transfers are lawful under GDPR.



44. Data Security Breaches



Where an incident gives rise to a risk of unauthorised disclosure, loss, destruction or alteration of personal data, in manual or electronic form, Mount Temple Comprehensive School will give immediate consideration to informing those affected. Such information permits data subjects to consider the consequences for each of them individually and to take appropriate measures.

In appropriate cases, Mount Temple Comprehensive School will also notify organisations that may be in a position to assist in protecting data subjects including, where relevant, An Garda Síochána, Department of Education and Skills etc. If the data concerned is protected by technological measures such as to make it unintelligible to any person who is not authorised to access it, Mount Temple Comprehensive School may conclude that there is no risk to the data and therefore no need to inform data subjects. Such a conclusion would only be justified where the technological measures (such as encryption of a laptop hard drive) were of a high standard.

All incidents of loss of control of personal data in manual or electronic form by a data processor must be reported to Mount Temple Comprehensive School as soon as the data processor becomes aware of the incident.

All incidents in which personal data has been put at risk should be reported to the Office of the Data Protection Commissioner (DPC) as soon as the school becomes aware of the incident, except when the full extent and consequences of the incident has been reported without delay directly to the affected data subject(s) and it affects no more than 100 data subjects, and it does not include sensitive personal data or personal data of a financial / sensitive personal nature. If there is any doubt related to the adequacy of technological risk-mitigation measures, then Mount Temple Comprehensive School will report the incident to the DPC.

Mount Temple Comprehensive School will make report the breach to the DPC within 72 Hours of becoming aware of the incident, outlining the circumstances surrounding the incident. This initial report will be online through their website and will include:

- The amount and nature of the personal data that has been compromised.
- The action being taken to secure and / or recover the personal data that has been compromised.
- The action being taken to inform those affected by the incident or reasons for the decision not to do so.
- The action being taken to limit damage to those affected by the incident.
- A chronology of the events leading up to the breach.
- And the measures being taken to prevent repetition of the incident.

Depending on the nature of the incident, the DPC may investigate the circumstances surrounding the personal data security breach. Investigations may include on-site examination of systems and procedures.

Even where there is no notification of the DPC, Mount Temple Comprehensive School will keep a summary record of each incident which has given rise to a risk of unauthorised disclosure, loss, destruction or alteration of personal data. The record should include a brief description of the nature of the incident and an explanation of why the school did not consider it necessary to inform the DPC.



45. Data Security Breach – Action Plan



Identification and Initial Assessment of the Incident

- Consider partial or complete systems lockdown.
- Identify and confirm volumes and types of data affected.
- Establish what personal data is involved in the breach.
- Identify the cause of the breach.
- Estimate the number of data subjects affected.
- Establish how the breach can be contained.

Containment and Recovery

- Establish who within the school needs to be made aware of the breach.
- Establish whether there is anything that can be done to recover the losses and limit the damage the breach could cause.
- Establish if it is appropriate to notify affected individuals immediately (for example where there is a high level of risk of serious harm to any individual).

Risk Assessment

- Assessment of volumes and types of data involved will be undertaken and a risk assessment carried out to establish and the risk to data subjects.

Notification

- On the basis of the evaluation of risks and consequences, the Principal will decide whether it is necessary to notify relevant stakeholders i.e.
 - the Gardaí.
 - the Data Subjects affected by the breach.
 - the Data Protection Commissioner.
 - the School's Insurers.
- In accordance with the Data Protection Commissioner's Code of Practice all incidents in which Personal Data has been put at risk will be reported to the Office of the DPC within 72 hours of the school first becoming aware of the breach.
- If, following the assessment described above, it is established that the data breach has been fully and immediately notified to the Data Subjects affected and it affects no more than 100 Data Subjects and it does not include sensitive personal data or personal data of a financial nature, it may not be required to be notified to the DPC. This will be assessed on an individual basis according to the school's policy on Data Breach above, and where there is any doubt, legal advice will be sought.

Evaluation and Response

- Following any serious Breach of Data incident, a thorough review will be undertaken by the school and a report will be made to the Board of Management. This will identify the strengths and weakness of the process and will indicate what areas may need to improve.
- Response may also include updating the Data Protection Policy and retraining staff.



46. Subject Access Requests



Data Subject Rights

Data Subjects, based upon a request made in writing to Mount Temple Comprehensive School using the 'Subject Access Request Form' and upon successful verification of their identity, can obtain the following information about their own Personal Data:

- The purposes of the collection, processing, use and storage of their Personal Data.
- The source(s) of the Personal Data, if it was not obtained from the Data Subject.
- The categories of Personal Data stored for the Data Subject.
- The recipients or categories of recipients to whom the Personal Data has been or may be transmitted, along with the location of those recipients.
- The envisaged period of storage for the Personal Data or the rationale for determining the storage period.
- The right of the Data subject to:
 - object to Processing of their Personal Data.
 - lodge a complaint with the Data Protection Authority.
 - request rectification or erasure of their Personal Data.
 - request restriction of Processing of their Personal Data.



Student making a Subject Access Request

- A student aged eighteen years or older (and not suffering under any medical disability or medical condition which may impair their capacity to give consent) may give consent themselves.
- If a student aged eighteen years or older has some disability or medical condition which may impair their ability to understand the information, then parental/guardian consent will be sought by the school before releasing the data to the student.
- While a student aged from thirteen up to and including seventeen can be given access to their personal data, depending on the age of the student and the nature of the record, i.e. it is our policy that:
 - If the information is ordinary, routine or non-controversial (e.g. a record of a test result) the student could readily be given access.
 - If the information is of a sensitive nature or if the information would be likely to be harmful to the individual concerned, parental/guardian consent will be sought before releasing the data to the student.
- Each student request for Access to Personal Data will be assessed individually.





Parent(s) / Guardian making a Subject Access Request

- Where a parent(s) / guardian(s) makes an access request on behalf of his/her child (a student aged under 18 years), the right of access is a right of the data subject (i.e. it is the student's right). In such a case, the access materials will be sent to the parent(s) / guardian(s) who requested them. This means that the access request documentation will be sent to the address at which the student is registered on the school's records and will be addressed to the parent(s) / guardian(s) subject to the provisions above.



Third Parties making a Subject Access Request

- Where a third party makes an access request on behalf of a child (a student aged under 18 years), the right of access is a right of the data subject (i.e. it is the student's right).
- The student (over 18) or parent(s) / guardian(s) will be required to give permission for the person or organisation making the request on their behalf. Proof of identity will be required to be submitted as part of the Subject Access Request. Once confirmed, the personal data will be sent to the representative at the address provided.



Logging Access Requests

All requests received for access to or rectification of Personal Data must be directed to the Principal, who will log each request as it is received using the Subject Access Request Register.



Responding to Subject Access Requests

- A response to each request will be provided within 30 days of the receipt of the written request from the Data Subject.
- Appropriate verification must confirm that the requestor is the Data Subject or their authorised legal representative. Data Subjects shall have the right to require the school to correct or supplement erroneous, misleading, outdated, or incomplete Personal Data.
- If the school cannot respond fully to the request within 30 days, the school shall provide the following information to the Data Subject, or their authorised legal representative within the specified time:
 - An acknowledgement of receipt of the request.
 - Any information located to date.
 - Details of any requested information or modifications which will not be provided to the Data Subject, the reason(s) for the refusal, and any procedures available for appealing the decision.
 - An estimated date by which any responses will be provided.
 - The name and contact information of Mount Temple Comprehensive School individual who the Data Subject should contact for follow up.





Protecting Third Parties

- It should be noted that situations may arise where providing the information requested by a Data Subject would disclose Personal Data about a 3rd party. In such cases, information must be redacted as may be necessary or appropriate to protect that person's rights.



Right to Erasure

- The school shall erase the personal data of a data subject who requests the erasure of personal data concerning him or her without undue delay or will ensure the erasing of personal data without undue delay where one of the following grounds apply.
 - The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
 - The data subject withdraws consent on which the processing is based according to point (a) of article 6(1) 'Lawfulness of processing' or point (a) of article 9(2), 'Processing of special categories of personal data' the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. And where there is no other legal ground for the processing.
 - The data subject objects to the processing pursuant to article 21(1) 'right to object' and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) 'direct marketing':
 - The personal data has been unlawfully processed.
 - The personal data has to be erased for a legal obligation in Union or Member State law to which the controller is subject.
- A record of erasing the data subject's personal data shall be recorded and noted in the Board of Management Meeting Minutes.



47. Archiving Personal Data



Appraisal of Records

An appraisal process that limits the permanent preservation of records containing personal data to what is really necessary has been adopted. Personal Data containing significant historical value will be prioritised i.e. Photographs, Registers of Attendance / Enrolment, Academic Achievement in Second & Third Level Education, Sporting Achievements and photographs and video recordings of school and extracurricular activities and events may be selected for permanent preservation.

Data Minimisation:

Mount Temple Comprehensive School will adhere to the principle of personal data minimisation i.e. only minimal data that is adequate, relevant and limited to what is necessary in relation to the purposes of permanent preservation.

Security:

Appropriate technical and organisational measures will be adopted including but not limited to alarming the archive room and restricting access to a small number of keyholders.

Data Subject Rights

Mount Temple Comprehensive School will at all times observe Data Subject's Rights under GDPR.

Archiving Process

Mount Temple Comprehensive School will archive personal data where this data has significant historical value. The school will not hold data for longer than it is outlined in our Data Processing Map. Archiving will take place on an annual basis and will involve the following steps:

1. Identification of records (both electronic and paper) which contain significant historical value.
2. Identification of the purpose(s) for which the data was originally obtained i.e. why did we collect the data (see Data Processing Map & Retention Schedule).
3. Appraisal of the records to determine if they contain personal data that a) should be retained for a certain period of time and disposed of or b) should be preserved permanently for a specific lawful purpose (see Data Processing Map & Retention Schedule).
4. This step will involve:
 - a. Consulting the Retention period as outlined in the Data Map & Retention Schedule.
 - b. Identifying the records for disposal / archiving.
 - c. Obtain permission from the Principal / BoM / Trustee to dispose / archive of the records.
 - d. Document the disposal / archiving of records.
5. Once established, the data subject's files will be placed in an archive box and will be marked as "For Disposal DD/MM/YY" for records that will be retained for a specific time or "Archive Permanently" for records that will be retained Indefinitely. Pending Review by the BoM.
6. Consultation should also take place with the Principal for advice on record retention periods for certain records as needed.
7. Archived boxes will be held securely in the school's dedicated archive with restricted access.



48. Disposal of Personal Data



Data Subject Rights

Mount Temple Comprehensive School will conduct a regular review of the personal data we hold for the purpose of disposing of redundant personal data. Such a review will take place on an annual basis and will involve the following steps:

1. Identification of records (both electronic and paper) which contain personal data or special category personal data (see Data Processing Map & Retention Schedule).
2. Identification of the purpose(s) for which the data was originally obtained i.e. why did we collect the data (see Data Processing Map & Retention Schedule).
3. Appraisal of the records to determine if they contain personal data which is no longer necessary for the purposes for which it was originally obtained: This step will involve:
 - a. Consulting the Retention period as outlined in the Data Map & Retention Schedule.
 - b. Identifying the records for disposal.
 - c. Obtain permission from the Principal to dispose of the records.
 - d. Document the disposal of records.
4. Suitable third-party service provider should be contacted to provide a secure erasure and destruction service i.e. confidential shredding through a certified data destruction specialist.
5. Consultation should also take place with the Principal for advice on record retention periods and to ensure that records are disposed of in a safe, secure and appropriate manner.

49. Governance



Supervisory Authority

The Irish Data Protection Commissioner is our lead supervisory authority under GDPR.





Monitoring Compliance

Mount Temple Comprehensive School will carry out internal GDPR compliance audits against school policy and procedures. We will also arrange audits of our compliance by independent third parties at longer intervals. All audit records will remain confidential to Mount Temple Comprehensive School and will be shown only to regulatory authorities on request. Each audit will, as a minimum, assess:

- Compliance with Data Protection Policy in relation to the protection of Personal Data, including:
 - The assignment of responsibilities.
 - Raising awareness.
 - Training of Employees.
- The effectiveness of Data Protection related operational practices, including:
 - Data Subject rights.
 - Personal Data incident management.
 - Personal Data complaints handling.
- The level of understanding of Data Protection Policies and Privacy Notices.
- The currency of Privacy Notices & Notices.
- The accuracy of Personal Data being stored.
- The conformity of Data Processor activities.

The Data Protection Coordinator, in cooperation with key stakeholders will devise a plan with a schedule for correcting any identified gaps within a defined and reasonable time frame.



Breaches of the Data Protection Policy

Breaches of the GDPR or the school's Data Protection Policy may be treated as a matter for discipline and depending on the seriousness of the breach and will be dealt with by the Principal in accordance with the School's Code of Behaviour.

For breaches of the GDPR Regulations, which do not warrant such action, the employee will be advised of the issue and given a reasonable opportunity to put it right.

In the case of contractors or external service providers, serious breaches of the policies and procedures can and will be deemed grounds for termination of contractual agreements.



