

PERSONAL DATA AND RETENTION SCHEDULE

The purpose of a Data Audit is to ascertain exactly

- what personal data the BoM as Data Controller has
- the legal basis for processing that data
- where it stores it
- how long it is retained
- who it shares the data with

The Data Controller will be in a position

- to provide information in relation Data Access Requests
- produce a Document Trail – understand how information flows through the school system i.e.
 - how it is collected, where it is used – offices, classrooms, etc.
 - what forms it is in – electronic, paper
 - copies – are there multiple copies of the data and are they all accounted for
 - who has access to it
 - where it ends up – stored for a medium or long term or safely disposed of
 - how data is safely disposed of – shredded, incinerated, etc.
- to assess the extent and degree of risk of any Data Breach which might occur
- to assess how safe the data is in its current storage location and to improve this if required assess where there are weaknesses in the school's Data Protection procedures and remedy them by updating policies, protocols or procedures as required

Types of Data Held by BoM

Data on Pupils

Data on Parents

Data on Staff – Teachers, SNAs, Ancillary Staff

Data on Visiting Teachers/facilitators

Data on the Clergy/parish administrators/Ministers of faith

Data on Volunteers

Data on Tradespeople – Electricians, Plumbers etc.

Data on Educational Supply Companies – Company Representatives

Data on Professional Service Providers – Accountants, Lawyers etc.

Data on Third Party Processors – School Administration software, School Accounting etc.

Data on Local Emergency Services – Gardaí, Medical, Fire Brigade etc.

The Grid below is the B.O.M.'s Data Retention Schedule

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Pupil Personal Data_ Name Sex Address DoB PPSN	Enrolment Form	Necessity in the public interest	Enrolment Form Roll Book Register Class Lists School Administration software	School Office Principal's Office Classrooms Storage Room	DES HSE DSP	Indefinite on Roll Book

			Office Filing Class Filing Office Computer Class Computer DES POD			
Pupil Special Category Data:- <i>Religion</i> <i>Ethnic Data</i>	Enrolment Form	Consent	Enrolment Form School Administration software Office Filing Office Computer Class Computer DES POD	School Office Principal's Office Classrooms Storage Room	DES on consent	25 years on Enrolment Form
Parental Data:- Name <i>Address</i> <i>Phone Nos</i> <i>e-mail</i>	Enrolment Form	Necessity in the public interest AND Protection of vital interest of the subject	Enrolment Form Register School Administration software Office Filing Office Computer Class Computer	School Office Principal's Office Classrooms Storage Room	DES HSE DSP	Indefinite on Register
Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Teacher Data:- <i>Name</i> <i>Address</i> <i>Phone Nos</i> <i>e-mail</i> <i>Application Form</i> <i>CV</i> <i>Seniority list</i> <i>Details regarding promotions</i>	Recruitment Process Annual Update	Necessity in the public interest AND Contract	School Administration software Office Filing Office Computer Class Computer	School Office Principal's Office Storage Room	DES	Duration of the Teacher's employment + 7 years

BoM Members <i>Name</i> <i>Address</i> <i>Phone Nos</i> <i>e-mail</i>	BoM Appointment Process	Necessity in the public interest	Office Filing Office Computer Principal's Office	School Office Principal's Office Storage Room	DES Patron Charities Regulator	Indefinite on BoM Minutes
Service providers: (Repairs; builders; maintenance; contractors;) <i>Name</i> <i>Address</i> <i>Phone Nos</i> <i>e-mail</i>	When seeking tenders Given willingly by Electrician	Contract AND Protection of the vital interests of the subject.	Office Filing Office Computer Principal's Office	School Office Principal's Office Storage Room	BoM Other Tradespeople – with connected activities	While the Service provider (e.g.Electrician) is being employed by the BoM
Student Support file Individual Pupil Assessment and Report carried out by third party professional (e.g. psychologist; Occupational therapist; psychiatrist; Speech and Language therapist etc.)	Parents and school staff	Necessity in the public interest	Principal's Office Office Filing SEN Filing	Principal's Office School Office SEN Classroom	DES NCSE	Indefinitely
Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
School Supplies Company Reps <i>Name</i> <i>Address</i> <i>Phone Nos</i> <i>e-mail</i>	Given willingly by Reps	Contract	Office Filing Office Computer Class Computer Principal's Office	School Office Principal's Office Classrooms Storage Room	Staff BoM Parents Council	While that Company / Rep is being employed by the BoM

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
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Data Processor:- (e.g. School Administration software; School accounting; School photographs/videos;) Name Address Phone Nos e-mail	Given willingly by Data Processor	Contract AND Consent	Office Filing Office Computer	School Office Principal's Office Classrooms Storage Room	BoM Admin Staff	For as long as the Data involved is being processed on behalf of the BoM
Emergency Services:- Name Address Phone No e-mails	Given willingly by arrangement	Protection of the vital interests of the subject	Office Filing Office Computer	School Office Principal's Office Classrooms Storage Room	BoM Admin Staff Teachers	For as long as the Doctor is being used as for emergency by the school
Pupils' school work; Yearly Assessments and Reports	Part of the work and purpose of the school	Necessity in the public interest	Office Filing Office Computer	School Office Principal's Office Classrooms Storage Room	Parents Pupils DES NCSE Other schools to where pupils transfer	Until pupil attains 25 years of age

Pupils' accident reports	Recorded at time of accident	Compliance with a legal obligation	Office Filing Office Computer	Staffroom/School Office Principal's Office Classrooms	Parents Medical Personnel School insurers Health and Safety Authority. Medical emergency personnel when necessary	Indefinitely
Pupils' notes under Children First	Recorded at time of concern	Compliance with a legal obligation	Secure Office Filing cabinet Principal's Office	Principal's office/secure area.	Tusla Gardaí Parents	Indefinitely
Pupils' School attendance records	Recorded daily on Aladdin	Compliance with a legal obligation	Roll Books/ Aladdin Office Filing Office Computer	School Office Principal's Office Classrooms Storage Room	Tusla Parents DES	Until pupil attains 25 years of age Roll Books are stored indefinitely
Pupils' Medical details and details regarding any special condition	At enrolment or as soon as details are known.	Protection of the vital interests of the subject	Office Filing Office Computer	School Office Principal's Office Classrooms Storage Room	School staff NCSE Medical emergency personnel when necessary	Until pupil attains 25 years of age.
Pupils' Individual Education Plans (I.E.P.s)	Parents, teachers, additional professional staff who assess the pupil	Necessity in the public interest	Office Filing Office Computer	School Office Principal's Office Classrooms	Pupils Teachers Parents NCSE DESS	Indefinitely

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Staff members' accidents reports	Recorded at time of accident	Compliance with a legal obligation	Office Filing Office Computer	School Office Principal's Office	Medical Personnel School insurers HSA Medical emergency personnel when necessary	Indefinitely
Staff Medical details, Medial Certs and details regarding any special condition Staff and Volunteers vetting disclosures	From staff members, medical personnel and Medmark Vetting Bureau	Compliance with a legal obligation AND Contract Compliance with a legal obligation AND Contract	Office Filing Office Computer Principal's Office	School Office Principal's Office	DES BoM	Duration of the Staff member's employment + 7 years
Correspondence between parents and Teachers in relation to educational matters	From Parents and Staff	Necessity in the public interest – provision of education	Classroom Filing Office Filing	Classroom Office Principal's Office	Principal BoM	Until the issue is dealt with
Records of complaints made by parents/ guardians	From Parents / Guardians	To comply with Complaints Procedure	Classroom Filing Principal's Filing	Classroom Principal's Office	Principal BoM Insurance Company Legal Advisor	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

