

GDPR Policy

Policy Name	GDPR
	1 Introduction 2 2 Aims of the Policy..... 2 3 The Policy 3 3.1 Scope of the Policy 3 3.2 Responsibilities 3 3.3 Data Subject Rights 3 3.4 Data Processing Principles 5 3.5 Records Retention and Purpose..... 7 3.6 Data Sharing..... 12 3.7 Data Access Requests..... 12 3.8 Personal Data Breaches 13 3.9 Eradication of unnecessary personal data 13 4. Communication of his Policy 13 5 Adoption by the Board 14 Appendix 1. Glossary..... 15 Appendix 2. School Record Retention Table..... 17 References: 19
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MATER DEI ACADEMY

1 Introduction

Mater Dei Academy (MDA) has developed this policy in order to comply with data protection legislation.

This policy applies to all personal data held by MDA. The applicable data protection legislation is The Irish Data Protection Act (2018) and the European General Data Protection Regulation (2016) . Both impose statutory responsibilities on MDA as well as providing a number of fundamental rights for students, parents, staff and other stakeholders.

The General Data Protection Regulation is a regulation in EU law on data protection and privacy in the European Union. It also relates to the transfer of personal data outside the EU.

Mater Dei Academy gathers and processes personal information in order to effectively run MDA, for communication with stakeholders, human resource management, academic records, fundraising, financial transactions and to meet legal, statutory and contractual obligations.

MDA will never collect any unnecessary personal data and will not process or retain information in any way, other than as specified in this policy.

Should the need arise to use data in a way other than described in this policy, MDA will notify individual stakeholders and the appropriate consents will be sought.

MDA is a new second level school and as such does not have historical data. The systems used to gather, process and retain your data are designed with data protection, privacy, security and transparency as paramount.

Any amendments to this Data Protection Policy will be formally communicated through email and MDA website.

2 Aims of the Policy

- To ensure MDA gathers and processes personal information in compliance with the relevant data protection legislation and best practice
- To inform MDA students, parents, staff and other stakeholders of their data protection rights
- To inform MDA students, parents, staff and other stakeholders of what information MDA gathers and how it is processed
- To prescribe for staff the data handling processes required in MDA.
- To identify the categories of responsibility for data protection and to assign these
- To ensure all personal data is held securely and to provide accountability and transparency around the processes involved

3 The Policy

3.1 Scope of the Policy

This policy applies to the following stakeholders:

- The Board of Management / Directors of Mater Dei Academy CLG
- Academy staff, volunteers and potential staff (applicants)
- Students, past, current and prospective students (applicants)
- Parents and guardians of students and prospective students (applicants)
- Donors and potential donors
- Fundraising Affiliates

3.2 Responsibilities

MDA is the Data Controller for personal data relating to its past, present and future staff, students, parents/guardians and other members of the community. The statutory responsibility of Controller is assigned to the Mater Dei Academy CLG.. The School Manager is responsible for coordinating the implementation of this policy and for ensuring that all staff and volunteers who handle or have access to personal data are familiar with the policy and their responsibilities in this regard. All staff and volunteers are responsible for being familiar with this policy and following this policy in all dealings with personal data.

Name	Responsibility
Mater Dei Academy CLG	Data Controller
MDA School Manager	Implementation of Policy
All Staff	Adherence to Data Processing Policy and Principles
Entire MDA Community	Awareness and respect for all personal data

3.3 Data Subject Rights

The data protection rights of individuals under GDPR legislation are as follows:
(See GDPR Articles 12-23 for a full explanation of subject rights and their application)

Right to be informed: Data subjects are entitled to information about how their personal data will be processed. This right is primarily fulfilled through the publication of this Data Protection Policy.

Right of access: Data subjects are entitled to see any information held about them. MDA will, on receipt of a request from a data subject, confirm whether or not their personal data is being processed. In addition, a data subject can request a copy of their personal data. MDA in responding to a right of access will ensure that it does not adversely affect the rights of others.

Right to rectification: If a data subject believes that MDA holds inaccurate information about them, they can request that this information is corrected. The

personal record may be supplemented with additional material where it is adjudged to be incomplete.

Right to be forgotten Data subjects can ask MDA to erase their personal data. MDA will act on such a request providing that there is no compelling purpose or legal basis necessitating retention of the personal data concerned.

Right to restrict processing Data subjects have the right to seek a restriction on the processing of their data. This restriction (in effect requiring the controller to place a “hold” on processing) gives an individual an alternative to seeking erasure of their data. It may also be applicable in other circumstances such as where, for example, the accuracy of data is being contested.

Right to data portability This right facilitates the transfer of personal data directly from one controller to another. It can only be invoked in specific circumstances, for example, when processing is automated and based on consent or contract.

Right to object Data subjects have the right to object when processing is based on MDA’s legitimate interests or relates to a task carried out in the public interest. MDA must demonstrate compelling legitimate grounds if such processing is to continue.

Right not to be subject to automated decision making This right applies in specific circumstances (as set out in GDPR Article 22).

Right to withdraw consent In cases where MDA is relying on consent to process your data, you have the right to withdraw this at any time, and if you exercise this right, we will stop the relevant processing.

Limitations on Rights: While MDA will always facilitate the exercise of your rights, it is recognised that they are not unconditional: MDA may need to give consideration to other obligations, legal and otherwise.

Right to Complain

Data subjects have a right to complain if they have any concerns about data collection, processing and retention. In the first instance concerns should be addressed to MDA School Manager who is responsible for operational oversight and applications of this policy. A matter that is still unresolved may then be referred to MDA’s Board of Management by writing to the Board Chairperson c/o MDA.

Should this not effectively address the data protection complaint or concern, the data subject has the right to bring the matter to the attention of the Irish Data Protection Commission.

Data Protection Commission
Canal House, Station Road
Portarlinton
Co. Laois
R32 AP23
+353 57 8684800
info@dataprotection.ie

3.4 Data Processing Principles

Processing is any task that is carried out with personal data e.g. collection, recording, organising, altering, retrieval, storage, erasure as well as transmission or dissemination. Processing can include any activity that relates to personal data under the control of MDA regardless of whether the records are processed by automated or manual means.

Principles and Lawful basis for processing personal data.

Lawful Basis

The data protection legislation pertaining to the processing of personal data requires that all the below principles must be adhered to, Additionally at least one of the following six bases (GDPR Article 6) must apply.

1. Compliance with a legal obligation
2. Necessity in the public interest
3. Legitimate interests of the controller
4. Contract
5. Consent
6. In the vital interests of the data subject

Principles

Obtain and process Personal Data fairly: Information on students and prospective students is gathered with the help of parents/guardians and staff. Information is also transferred from their previous schools to MDA. Information the Academy holds on other individuals e.g. members of staff, staff applicants, parents/ guardians, volunteers and donors is typically furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with MDA. All such data is treated in accordance with the Data Protection legislation and the terms of this Data Protection Policy. The information will be obtained and processed fairly and transparently

Data kept for one or more specified and explicit lawful purposes: The BoM or Academy manager will ensure individuals are informed of the reasons for which their data is collected and the uses to which their data will be put. All data is kept in the best interest of the individual and for the effective running of MDA.

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. Data will not be further processed in a manner that is incompatible with these purposes. Information will only be disclosed on a 'need to know' basis, and access to it will be strictly controlled

Ensure that it is adequate, relevant and not excessive: Only the necessary amount of relevant information required to provide an adequate service will be gathered and stored.

MATER DEI ACADEMY

Keep Personal Data accurate, complete and up-to-date: Students, parents/guardians, and/or staff should inform MDA 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, MDA will make all necessary changes to the relevant records. 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

Retain data for no longer than is necessary for the specified purpose or purposes for which it was given: Information pertaining to students will be kept for the duration of the individual's time in MDA unless it becomes obsolete due to inaccuracy or being no longer relevant. Thereafter, the nature of this data will determine how long it is retained for. For members of staff, the Board of Management, Academy Directors, and Donors staff, MDA will comply with the requirements of the Revenue Commissioners with regard to the retention of records relating to employees and financial transactions as well as the Organisation of Working Time Act (1997) and GDPR legislation. Please see Appendix 2 for MDA's Data Retention Schedule

Keep Personal Data safe and secure: Only those with a genuine reason for doing so may gain access to the information. Personal Data is securely stored under lock and key in the case of manual records and protected with computer software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) are encrypted and password-protected

Provide a copy of their personal data to any individual on request: Individuals have a right to know and have access to a copy of personal data held about them and to know by whom/ where it is held and the purpose for which it is held.

Consent: Mater Dei Academy gathers personal data with consent. Consent is implied where data is provided by the data subject themselves or for students(minors) where personal data is provided by the parent or guardian directly to MDA.

Where specific consent is the basis for the provision of personal data, (e.g. data required to join an after-school activity, sports or any other optional school activity) the consent must be a freely-given, specific, informed and unambiguous indication of the data subject's wishes. Mater Dei Academy will require a clear, affirmative action e.g. ticking of a box/signing a document to indicate consent. Consent can be withdrawn by data subjects in these situations

Third party information about students is gathered only with full and informed consent of the student and or parent/guardian.

Information on staff, volunteers and potential staff and volunteers is compiled only as necessary, during the course of their employment or contact with MDA. This data is typically provided by the personnel themselves. Where personal data is provided by a third party, consent for this is established by the data subject.

Data Processing

Data processing includes but is not limited to the following:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data
- Retrieving, consulting or using the data
- Disclosing the data by transmitting, disseminating or otherwise making it available
- Aligning, combining, blocking, erasing or destroying the data

Third Party Data Processors

Where MDA outsources to a data processor off-site, it is required by law to have a written contract in place. This third party agreement specifies the conditions under which the data may be processed, the security conditions attaching to the processing of the data and that the data must be deleted or returned upon completion or termination of the contract. GDPR legislation must be adhered to by the third party and the third party contract.

3.5 Records Retention and Purpose

Student Records

These records may include:

- Name, address, contact details and PPS number
- Date and place of birth
- Names and addresses of parents/guardians and contact details
- Next of kin and emergency contact information
- Relevant medical information necessary to support student's safe attendance, e.g. allergies, asthma, epilepsy etc.
- Psychological or psychiatric reports where information is relevant to the students schooling
- Religious affiliation
- Copies of birth cert, baptism cert etc.
- Language spoken and language assessments. Relevant where English is not the first language or there is another language support need
- Information on Irish language exemptions
- Application forms and student transfer forms
- Records transferred from previous educational settings
- Attendance records
- Consents
- Formal correspondence with the student, parents or guardian
- Formal correspondence internally or externally about the student

MATER DEI ACADEMY

- Academic records – subjects studied, class assignments, examination results, project assessments, official school reports, records of significant achievements, previous academic records or references
- Notes of any interagency meetings
- Photographs and recorded images of student
- Records of significant achievements
- Subject exemptions
- Special student needs
- Records of disciplinary issues/investigations and/or sanctions imposed
- Photographs and articles recording student endeavour and success which may appear in school publications or on the website
- Records of any reports MDA (or its employees) have made in respect of the student to state departments and/or other external agencies
- Accident reports
- Incident report forms
- Notifications to Insurance companies
- Notifications to Health & Safety Authority
- Records of any inhouse Academy investigations
- Records of external investigations

The purpose of Student Records may include:

- To ensure that the student meets MDA's admission criteria
- To enable each student to develop to their full potential
- To comply with legislative or administrative requirements
- To ensure MDA can meet its duty of care to the students well being
- To enable parents/guardians to be contacted in the case of emergency or in the case of Academy closure, or to inform parents of their child's educational progress or to inform parents of Academy events etc.
- To meet the educational, social, physical and emotional requirements of the student
- To ensure that students meet minimum age requirements courses
- To ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- To furnish documentation and/or information about the student to state bodies in compliance with law and directions issued by government 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.
- To celebrate school and pupil achievements, compile publications, yearbooks, update the school website, record Academy events, and to keep a record of the history of MDA.

MATER DEI ACADEMY

Student records are held in both manual and electronic form. Such files are kept in secure filing cabinets or in electronic form, are password protected and have adequate encryption and firewall software. Only personnel who are formally authorised to use the data can access it. Employees are required to maintain the confidentiality of any data to which they have access.

Parent/Guardian Records

MDA does not keep specific personal files for parents or guardians. However, information about parents including communication details, consents provided, correspondence and payments made, will be held in the file of each student. This information shall be treated in the same way as any other information in the student file. Parent payment information may be held in MDA accounts management system. This is an online system but receipts and invoices may be stored in hard copy form.

Staff records

Staff includes existing members of staff, former members of staff, applicants for positions within MDA, visiting teachers and volunteers.

These staff records may include:

- Name, address, date of birth, contact details and PPS number
- Original records of application and appointment to posts, including references and CV.
- Garda Vetting
- Next of kin and emergency contact information
- Medical information relevant to the provision of safe working conditions
- Details of work attendance, hours worked, work absence, annual leave accrual and sick leave
- All records required by the Organisation of Working Time Act 1997
- Performance related work record including appraisals and staff supervisions.
- All formal correspondence with staff
- Record of assigned duties and responsibilities
- Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their Academy duties
- Mandatory staff training, dates, completion and maintenance schedule
- Records of any reports MDA (or its employees) may have made in respect of the staff member to state departments and/or other agencies under mandatory reporting legislation and/or child- safeguarding procedures
- Staff payment information including, payslips, end of year statements, staff bank information and all appropriate tax deductions and payments
- Details of approved absences (career breaks, parental leave, study leave, etc.)
- Details of work record (qualifications, classes taught, subjects, etc.)

MATER DEI ACADEMY

- Details of any accidents/injuries sustained on school property or in connection with the staff member carrying out their Academy duties
- Records of any reports MDA (or its employees) have made in respect of the staff member to State departments and/or other agencies under Children First Act 2015

Purpose of Staff Records

- The management and administration of MDA
- Facilitating the payment of staff, and calculation of other benefits/entitlements
- Human resources management
- Staff support and development
- Staff performance management
- Recording responsibilities assigned
- Enabling MDA 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)
- Enabling MDA to comply with requirements set down in the Organisation of Working Time Act (1997)
- Complying with legislation relevant to MDA.

Location: Staff records are held in both manual and electronic form. Such files are kept in secure filing cabinets or in electronic form that is password protected and has adequate encryption and firewall software. Only personnel who are formally authorised to use the data can access it. Employees are required to maintain the confidentiality of any data to which they have access.

Board of Management Records

Board of Management records are kept to ensure appropriate records of decisions relating to the governance and operation of the school

Board of management Records include:

- Name, address and contact details of each member of the Board of Management (including former members of the Board of Management)
- Records of all appointments to the Board and the processes followed
- Record of attendance at all Board meetings
- Records of all Board decisions taken
- Minutes of Board of Management meetings and correspondence to the Board, which may include references to individuals
- Correspondence in relation to Mater Dei Academy CLG

Purpose of Board of management Records

MATER DEI ACADEMY

- Administration of the Board of Management
 - Transparency and Accountability
 - To maintain a record of Board appointments and decisions
 - To review and substantiation of decisions
- To enable the Board of Management to operate and govern MDA effectively in line with its obligations as a CLG with Charitable status

Location: Board of Management data is held in both manual and electronic form. Such files are kept in secure filing cabinets or in electronic form that is password protected and has adequate encryption and firewall software. Only personnel who are formally authorised to use the data can access it.

Records of Creditors

MDA may hold some or all of the following information about creditors

- Name, address, contact details, PPS number
- Personal and or company tax details
- Bank details
- Invoice and payment details
- Schedules of work and work contracts

Purpose of Record of Creditors

- Management and administration of MDA's financial affairs
- Payment of invoices
- Compiling of annual financial accounts
- Complying with audits and investigations by the Revenue Commissioners.

Donor Records

Personal data may be retained for donors to Mater Dei Academy

- Donor contact information, including name, address, email, PPS number
- Bank details
- CHY form
- Signature
- donations made and committed to
- Record of correspondence
- Record of source or associations

Purpose of Donor Records

- Management and administration of donations
- Processing of receipts
- Compiling of annual financial accounts
- Complying with audits and financial regulations
- To claim tax relief on donations made

Location: Only Directors have access to donor information. Donor information is held manually and in electronic form. Such files are kept in secure filing cabinets or in electronic form that is password protected and has adequate encryption and firewall software. Only personnel who are formally authorised to use the data can access it.

Financial Records Some financial records may contain personal data. This is dealt with in the categories of records identified above. Generally financial information is required for routine management and administration of MDA's financial affairs, including the payment of fees, payment of donations, invoices, receipts, submissions to revenue, the compiling of annual financial accounts and complying with audits and investigations by the Revenue Commissioners.

Financial data are kept in secure filing cabinets or in an electronic form that is password protected and has adequate encryption and firewall software. Only personnel who are formally authorised to use the data can access it.

3.6 Data Sharing

From time to time MDA may disclose Personal Data to third parties, or allow third parties to access specific personal data under its control.

An example could arise where a third level institute requisitions student records. Most data transfer to other bodies arises as a consequence of sharing of academic records. The majority of the data recipients are Controllers in their own right, for example, third level institutions. As such their actions will be governed by national and European data protection legislation as well their own organisational policies.

Requirements on data sharing

- In all circumstances where personal data is shared with others, MDA will ensure that there is an appropriate lawful basis in place (GDPR Articles 6, 9 as appropriate).
- In all circumstances where personal data is shared with others, MDA will ensure that consent is in place unless another lawful basis legally compels sharing without consent.
- Where data is transferred to or from a jurisdiction outside the EU GDPR legislative area.

3.7 Data Access Requests

- Requests for access to personal data may be made by completing an Academy Data Request Form. Individuals are entitled to a copy of their personal data on a written request in compliance with Article 15 of the GDPR.
- Where a subsequent or similar request is made soon after a request has just been dealt with MDA may charge a fee to cover administrative costs.

- 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. Such consent must be given in writing to MDA Manager
- Data will be carefully redacted to omit references to any other individual and where it has not been possible to redact the data to ensure that the third party is not identifiable MDA will refuse to furnish the data to the applicant.
- In compliance with the GDPR, MDA may refuse to grant an access request where such a request is deemed manifestly unfounded or excessive.

3.8 Personal Data Breaches

- Refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. This means any compromise or loss of personal data, no matter how or where it occurs
- All incidents in which personal data has been put at risk must be reported to the Office of the Data Protection Commissioner within 72 hours
- When the personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the BoM must communicate the personal data breach to the data subject without undue delay
- If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller (BoM) without undue delay.

3.9 Eradication of unnecessary personal data

- MDA is committed to the timely eradication of unnecessary, redundant, duplicate or inaccurate data.
- Any sensitive data will have a review of use date set at the time of recording
- All general personal data will be eradicated once its purpose is terminated and or in keeping with the legal and best practice record retention requirements. See Appendix 2 for schedule of data retention
- **Data eradication will be completed by shredding hard copy files and documents and completely erasing softcopy documents such that no copy exists in either form**

4. Communication of this Policy

This policy has been made available to school personnel and provided to Parents or Guardians on request.

This policy and its implementation will be reviewed by the Board of Management once in every school year.

MATER DEI ACADEMY

This policy and its implementation will be reviewed by the Board of Management once in every school year.

Written notification that the review has been completed will be made available to Academy personnel and provided to the parents of Mater Dei Academy on request. The Academy will put in place an action plan to address any areas for improvement identified by the review.

5 Adoption by the Board

This GDPR Policy was approved by the Board of Management of Mater Dei Academy on the date below.

Signed: *Shantelle Murphy*
Chair, Board of Management

Date: 16/12/2020

Signed: *Rosarie O'Leary*
Secretary, Board of Management

Date: 16/12/2020

Appendix 1. Glossary

Child - a person under the age of 18 years. Children are deemed as vulnerable under GDPR and merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data.

Data Controller - an entity or person who, alone or jointly with others, determines the purposes and means of the processing of personal data. In this policy, the data controller is Mater Dei Academy Board of Management.

Consent - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data Protection Commission - the national supervisory authority responsible for monitoring the enforcing the data protection legislation within Ireland. The DPC is the organisation to which schools as data controllers must notify data breaches where there is risk involved.

Data Subject - is an individual who is the subject of personal data

Data concerning health - personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status. This is an example of special category data (as is data concerning special education needs).

Data Processing – performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data;
- Collecting, organising, storing, altering or adapting the data;
- Retrieving, consulting or using the data;
- Disclosing the data by transmitting, disseminating or otherwise making it available;
- Aligning, combining, blocking, erasing or destroying the data;

Data Protection Legislation – this includes (i) the General Data Protection Regulation (GDPR) - *Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*, and (ii) the Irish Data Protection Act (2018). GDPR is set out in 99 separate *Articles*, each of which provides a statement of the actual law. The regulation also includes 171 *Recitals* to provide explanatory commentary.

Personal data - any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data breach - a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Processor or Data Processor - a person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract (but does not include an employee of a controller who processes such data in the course of his or her employment).

Profiling - any form of automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour.

(Relevant) Filing System - any set of information that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.

Special categories of data - personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Appendix 2. School Record Retention Table

Pupil Related		Retention Periods
School Register/Roll Books		Indefinitely
Enrolment Forms		Hold until pupil is 25 Years *
Disciplinary notes		Never Destroy
Test Results – Standardised		Never Destroy
Psychological Assessments etc.		Never Destroy
SEN Files/IEPS		Never Destroy
Accident Reports		Never Destroy
Child Protection Reports/Records		Never Destroy
S.29 Appeals		Hold until pupil is 25 Years *
Interview Records		Retention Periods
Interview Board		18 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is being taken
Marking Scheme		19 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is being taken
Board of Management notes (for unsuccessful candidates)		20 months from close of competition plus 6 months in case Equality Tribunal needs to inform school that a claim is being taken
Staff Records		Retention Periods
Contract of Employment		Retention for duration of employment + 7 years
Teaching Council Registration		Retention for duration of employment + 7 years
Vetting Records		Retention for duration of employment + 7 years
Accident/Injury at work Reports		(6 years to make a claim against the school plus 1 year for proceedings to be served on school)
BoM Records		Retention Periods
BOM Agenda and Minutes		Indefinitely

MATER DEI ACADEMY

Other	Retention Periods
CCTV Recordings	28 days normally. In the event of criminal investigation – as long as is necessary
Payroll & Taxation	Revenue require a 6-year period after the end of the tax year
Invoices/receipts	Retain for 7 Years
Audited Accounts	Indefinitely

*** Why, in certain circumstances, does the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age**

The reasoning is that a pupil reaches the age of majority at 18 years and that there should be a 6-year limitation period in which it would be possible to take a claim against a school, plus 1 year for proceedings to be served on a school. The Statute of Limitations imposes a limit on a right of action so that after a prescribed period any action can be time barred.

References:

- Data Protection Act 2018
<http://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/html>
General Data Protection Regulation (GDPR official text) 2016 <https://eur-lex.europa.eu/eli/reg/2016/679/oj>
GDPR for Schools website <https://gdpr4schools.ie/>
Data Protection for Schools <http://dataprotectionschools.ie/en/>
Irish Data Protection Commission <https://www.dataprotection.ie/>
Data Breach Report <https://forms.dataprotection.ie/report-a-breach-of-personal-data>

