



SCOIL MHUIRE CARLANSTOWN
CARLANSTOWN, KELLS, CO. MEATH
ROLL NO. 18132 Q

DATA PROTECTION & RECORDS RETENTION POLICY

Introduction

This policy was recently formulated by the Staff and Board of Management of Carlanstown NS N.S. The purpose of the policy is to identify the records required to be retained by the school and to ensure confidentiality and manageable procedures in relation to access to such records by parents and stake holders.

Rationale

- A policy on record protection and record keeping is necessary to ensure that the school has proper procedures in place in relation to accountability and transparency.
- It is good practice to record pupil progress so as to identify learning needs.
- A policy must be put in place to ensure a school complies with legislation such as:
 - a) Education Act, Section 9 (G) requiring a school to provide access to records to students over 18 / parents.
 - b) Education Welfare Act 2000 – requiring a school to report attendance and transfer of pupils.
 - c) Data Protection Acts 1998 and 2003

Relationship to the School Ethos

Carlanstown N.S. promotes openness and co-operation between staff, parents and pupils as a means towards providing the caring environment through which a child can develop and grow to full potential.

Aims/Objectives

- To ensure the school complies with legislative requirements.
- To clarify the types of records maintained and the procedures relating to making them available to the relevant bodies.
- To put in place a proper recording and reporting framework on the educational progress of pupils.
- To establish clear guidelines on making these records available to parents and pupils over 18.
- To stipulate the length of time records and reports will be retained.

Data Protection Principles

All personal data records held by the school are obtained, processed, used and retained in accordance with the following eight principles of data protection (based on the Data Protection Acts)

- Obtain and process information fairly
- Keep it only for one or more specified, explicit and lawful purposes
- Use it and disclose it only in ways compatible with the purposes
- Keep it safe and secure
- Keep it accurate, complete and up-to-date



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- Ensure that it is adequate, relevant and not excessive
- Retain it no longer than is necessary for the specified purpose or purposes
- Provide a copy of his/her personal data to that individual on request

**THE PRINCIPAL ASSUMES THE FUNCTION OF DATA CONTROLLER AND SUPERVISES THE APPLICATION OF THE DATA PROTECTION ACT
WITHIN THE SCHOOL.**

The data under the control of the Principal comes under the following headings:

- **Personal Data:**

This data relates to personal details of the students/staff such as name, address, date of birth, gender, medical details, dietary information, PPS Number, parent/guardian details. These are kept in the Principal's office, secretary's office and on the school database system (Aladdin Schools) and the Primary Online Database (POD- students only).

- **Sensitive Data:**

This data relates to personal details which are deemed to be sensitive information such as ethnic origin, nationality and religious belief. These are kept in the Principal's office and on the school database system (Aladdin Schools) and the Primary Online Database (POD). Permission to forward this information to POD is required.

Details of all personal data which will be held, the format in which it will be held and the purpose(s) for collecting the data in each case. The *Personal Data* records held by the school may include:

Staff Records may include:

- Name, address and contact details, PPS number
- Original records of application and appointment
- Records of appointments to promoted posts
- Details of approved absences (career breaks, parental leave, study leave etc.)
- Details of work record (qualifications, classes taught, subjects etc.)
- Details of complaints and/or grievances including consultations or competency discussions, action/improvement/evaluation plans and record of progress

Note: A record of grievances may be maintained which is distinct from and separate to individual personnel files.

Staff records are kept for the purposes of:

- The management and administration of school business (now and in the future)
- To facilitate the payment of staff



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- To facilitate pension payments in the future
- Recording promotions made and changes in responsibilities etc.

These records will be kept manually within a filing system in a locked filing cabinet in the Principal's office and/or the secretary's office. Records may also be kept on computer record and on the school's database (Aladdin Schools). Some records will be kept both manually and electronically.

Student Records may include:

- Information which may be sought at enrolment including:
 - Name, address and contact details, PPS Number
 - Names and addresses of parents/guardians and their contact details
 - Nationality
 - Religious belief
 - Ethnic or cultural background
 - Child's mother tongue
 - Any relevant special conditions (e.g. special educational needs, health issues etc) which may apply
 - Information on previous academic record
 - Information that may exist in relation to Family Law
- Academic record – standardised test results, classroom test results, school report cards, screening tests such as MIST and NRIT, diagnostic test reports
- Learning support/resource data such as records of permission or refusals to allow children access to LS/RT services in the school Individual Education Plans, Individual Pupil Learning Profiles (if applicable)
- Psychological, psychiatric and/or medical assessments (if any)
- Attendance records
- Records of significant achievements
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Portfolios of student work

Each teacher also holds records on pupils in an assessment folder. Examples of what may be included are:

- Teacher designed tests
- Samples of student work
- Class assessment results

The purposes for keeping student records are:

- To enable each student to develop to their full potential
- To comply with legislative or administrative requirements



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- To ensure that eligible students can benefit from the relevant additional teaching or financial supports
- To support the provision of religious instruction
- To enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or to inform parents of school events etc.
- To meet the educational, social, physical and emotional requirements of the student
- To ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities

These records will be kept manually within a filing system in a locked filing cabinet in the Principal's office and/or the secretary's office. Records may also be kept on computer record, on the school's database (Aladdin Schools), on the Pupil Online Database (POD). Some records will be kept both manually and electronically. Some of these records will also be kept in the teacher's / learning support teacher's / resource teacher's classroom.

Board of Management Records:

Board of Management records may include:

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

The purpose for keeping Board of Management records is to enable the Board of Management to operate in accordance with the Education Act 1998 and other applicable legislation and to maintain a record of board appointments and decisions. These records will be kept manually within a filing system in a locked filing cabinet in the Principal's office and on computer record on the Principal's laptop.

Child Protection Data

All documents regarding disclosures or concerns on issues of Child Protection are stored in a locked cabinet in the Principal's office. Access is restricted to the Designated Liaison Person and the Deputy Designated Liaison Person. To ensure confidentiality, all these documents are filed by POD number rather than the child's name.

Other Records

The school may hold other records relating to individuals. Some examples of the type of other records which the school will hold are set out below (this list is not exhaustive):

Creditors



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The school may hold some or all of the following information about creditors (some of whom are self-employed individuals):

- Name, address and contact details
- PPS number
- Tax details
- Bank details
- Amount paid.

This information is required for routine management and administration of the school's financial affairs, including the payment of invoices, the compiling of annual financial accounts and complying with audits and investigations by the Revenue Commissioners. These records are kept in a locked filing cabinet in the secretary's office and on computer record that only personnel who are authorised to use the data can access. Employees are required to maintain the confidentiality of any data to which they have access.

CCTV Images/Recordings

CCTV is installed in some schools, externally and internally as detailed in the CCTV Policy. These CCTV systems may record images of staff, students and members of the public who visit the premises. Images are recorded for the purpose of crime-prevention, security and safety.

Cameras are located externally as detailed in the CCTV Policy. Recording equipment is stored securely in a restricted area. Access to images/recordings is restricted to authorised personnel only i.e. the principal of the school. Recordings are retained for 28 days, except if required for the investigation of an incident. Images/recordings may be viewed or made available to An Garda Síochána pursuant to section 8 Data Protection Acts 1988 and 2003.

Administrative Data

- Attendance Reports, Roll Book, Registers
- Accident Report Book
- Administration of Medicines Indemnity Form
- POD – Primary Online Database
- Aladdin Schools Database

Access to Records

The following will have access where relevant and appropriate to the data listed above:

- Parents/Guardians
- Past pupils over 18
- Tusla – Child and Family Agency
- Designated School Personnel



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- Department of Education & Skills
- First and Second level schools (where relevant parental consent will be sought in advance). An Education Passport is provided to all schools receiving 6th class pupils at the end of their time in the school.

Written authorisation must be supplied by parents in the event of data being transferred to outside agencies such as health professionals etc. Outside agencies requesting access to records must do so in writing, giving seven days' notice. Parents/Guardians can make such a request in writing.

The Annual School Report format, in line with NCCA guidelines, is issued to parents in June.

Storage

Records are kept for a minimum of 7 years. Standardised test booklets are shredded after one year but the raw score, STen score and percentiles are kept on record until past pupils reach 25 years of age. These are kept in the Principal's Office.

Completed roll books are stored in the school. Access to these stored files is restricted to authorised personnel only. For computerised records, systems are password protected.

Retention Schedule

Pupil Records	Retention Periods
School Register / Roll Books	Indefinitely
Enrolment Forms/School Transfer Forms	Hold until the pupil is 25 years
Disciplinary Notes	Never Destroy
Standardised Test Results	Hold until the pupil is 25 years
End of year reports	Hold until the pupil is 25 years
Pupils Sensitive Personal Data	Retention Periods
Psychological Assessments etc.	Indefinitely
SEN Files/IPLP's/IEP's	Indefinitely
Accident Reports	Indefinitely
Child Protection Records/Reports	Indefinitely
Section 29 Appeals	Hold until the pupil is 25 years
Interview Records for Staff	Retention Periods
Interview Board and marking scheme and board of management notes for unsuccessful candidates	18 months from close of competition plus 6 months in case Equality Tribunal & a claim is taken.



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Staff Records	Retention Periods
Application documents, Interview documents, Contract of employment, Teaching council registration, Vetting records etc Leave of absence Sick Leave Records Accident and Injury at work	Retain for duration of employment plus 7 years (6 years to make a claim against a school plus 1 year for proceedings to be served on school.)
Board of Management Records	Retention Periods
BOM Agenda and Minutes Principal's Reports CCTV recordings	Indefinitely Indefinitely 28 days normally or longer in the event of a criminal investigation
Financial Records	Retention Periods
Payroll and Taxation Invoices and Receipts Certified / Audited Accounts	Revenue require a 6 year period after the end of the tax year. Seven years Indefinitely.
Please Note: The reasoning the Data Protection Commission recommend the holding of records until the former pupil has attained 25 years of age 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 the 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.	

Links to other policies and to curriculum delivery

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

The following policies may be among those considered:

- Child Protection Policy
- Anti-Bullying Policy
- Code of Behaviour
- Mobile Phone Code
- Enrolment Policy
- CCTV Policy
- Substance Use Policy



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- ICT Acceptable Usage Policy
- SPHE etc.

Success Criteria

- Compliance with the Data Protection Act and the Statute of Limitations
- Easy access to records
- Framework in place for ease of compilation and reporting
- Manageable storage of records

Roles and Responsibilities

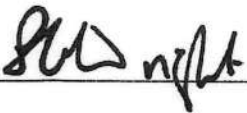
The school staff, under the direction of the Principal, will implement and monitor this policy. Individual teachers will design, administer and record all in-class testing. The Principal will ensure records are maintained and stored, particularly the records of students transferring to another school.

Implementation & Review

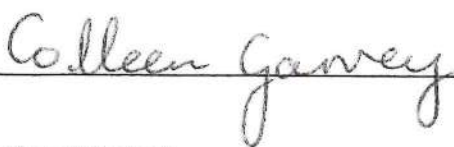
The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, An Garda Síochána, Department of Education and Skills, Audit units (internal and external to the school, national management bodies, legislation and feedback from parents/guardians, students, staff and others. The policy will also take into account the recently published 'Data Protection Toolkit for Schools.'

The date from which the policy will apply is the date of adoption by the Board of Management. Implementation of the policy will be monitored by the Principal of the school.

This policy was ratified by the Board of Management on 16th October 2025

Signed :  Date: 16/10/25

Chairperson, Board of Management

Signed :  Date: 16/10/25

Acting Principal



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References

Data Protection for Schools website
Data Protection Commission website
Education Act S 9. (g) 1998
Education Welfare Act s.20, 21, 28 2000.
Data Protection Acts 1998- 2003.
Freedom of Information Act 1997