



Malahide Community School

Draft Data Protection Policy

(under Review - April 2021)

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5. Keep it accurate and up-to-date.
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Introduction:

Malahide Community School is committed to ensuring its compliance with the requirements of the Data Protection Act 1998 - 2003 ('the Act'). We recognise the importance of personal data and the importance of respecting the privacy rights of individuals. This Data Protection Policy ('the Policy') sets out the principles which we will apply to our processing of personal data so that we not only safeguard one of our most valuable assets, but also respect the data protection rights of individuals and process their personal data in accordance with the law.

It is the responsibility of all our staff (which term includes contractors, temporary and permanent employees and [any other] to assist the Principal to comply with this Policy. All

staff must familiarise themselves with this Policy and apply their provisions in relation to all processing of personal data.

Failure to do so could amount to misconduct, which is a disciplinary matter and could ultimately lead to [summary] dismissal. Serious breaches could also result in personal criminal liability under the Act. In addition, a failure to comply with this Policy could expose the school to enforcement action by the Data Protection Commissioner (which could result in restrictions being imposed on our use of personal data and/or the imposition of monetary penalties) and to complaints or claims for compensation from affected individuals. There may also be negative publicity as a result of any breach that is made public.

For these reasons, it is important that all staff familiarise themselves with this Policy, and attend all training sessions in respect of the care and handling of personal data.

Summary

Malahide Community School is a data controller of Personal Data relating to its past, present and future employees, students, parents, members of board of management and various other individuals.

As such, Malahide Community School is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 and 2003 which can be summarised as follows:

- Obtain and process Personal Data fairly;
- Keep it only for one or more specified and explicit lawful purposes;
- Process it only in ways compatible with the purposes for which it was given initially;
- Keep Personal Data safe and secure;
- Keep data accurate, complete and up-to-date;
- Ensure that it is adequate, relevant and not excessive;
- Retain it no longer than is necessary for the specified purpose or purposes;
- And provide a copy of his/her Personal Data to any individual, on request.

Scope

Purpose of the Policy:

The Data Protection Acts apply to the keeping and processing of Personal Data, both in manual form and on computer. The purpose of this Policy is to assist Malahide Community School to meet its statutory obligations while explaining those obligations to staff.

Application of the Policy:

The Policy applies to all staff, parents/guardians, students and others insofar as they handle or process Personal Data in the course of their dealings with the school.

Supporting Policies:

This policy will be implemented with the support of other school policies such as the Malahide Community School:

- Acceptable Usage Policy
- Code of Behavior
- Role of the Year Head
- Special Educational Needs Policy
- Guidance and Counselling Policy

Glossary:

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

Data means information in a form that can be processed. It includes both automated data and manual data.

Automated data means any information on computer, or information recorded with the intention that it be processed by computer.

Manual data means information that is recorded as part of a relevant filing system or with the intention that it forms part of a system.

Relevant filing system means any set of information that, while not computerised, is

structured by reference to individuals, or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily accessible. Examples might include student files stored in alphabetic order in a filing cabinet or personnel files stored in the office.

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

Sensitive Personal Data refers to Personal Data regarding a person's racial or ethnic origin, political opinions or religious or philosophical beliefs; membership of a trade union; physical or mental health or condition or sexual life; commission or alleged commission of any offence; or criminal convictions or the alleged commission of an offence.

Policy Rationale:

In addition to its legal obligations under the broad remit of educational legislation and other legislation, Malahide Community School has a legal responsibility to comply with the Data Protection Acts. As more and more data is generated electronically and as technological advances enable the easy distribution and retention of this data, the challenge of meeting the school's legal responsibilities has increased. In the absence of a documented Policy, there is a risk that data entrusted to the school will be retained, used or disclosed in ways that breach individuals' data protection rights.

Identifying Personal Data

The Personal Data records held by Malahide Community School may include:

Staff records:

Categories of Staff Data:

1. These may include: Name, address and contact details, date of birth, PPS number marital and family status educational or previous employment background.
2. Original records of application and appointment interview records, references, record of appointments to promotion posts.
3. Details of approved absences (career breaks, parental leave, study leave etc.)
4. Records of in-service courses attended.
5. Details of work record (qualifications, classes taught, subjects etc.)
6. 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.
7. Superannuation and pension documentation: Salary, payroll details, bank details.
8. Medical card details.

Purpose of Collecting Staff Data:

For the management of Malahide Community School business now and into the future. e.g. to facilitate the payment of staff, to facilitate pension payments in the future, human resources management, recording promotions etc. and for compliance with legislation.

Sensitive Personal Data:

Certain categories of information are categorised as sensitive under data protection legislation. Malahide Community School may hold some or all of the following sensitive information about its employees:

- **Medical information, records of sickness absence and medical certificates.** The purpose of keeping this sort of information is to administer sick pay and disability entitlement, monitor and manage sickness absence and to comply with our health and safety obligations.

- **Garda Vetting records** will be retained in compliance with DES C/L 0063/2010 and subsequent relevant circular letters.

Location:

- Current Staff records are kept in the Principal's Office at Malahide Community School.
- Past Staff records are kept in a locked filing cabinet in the Boardroom.

Security:

Malahide Community School stores all personal information in controlled access, centralised databases (including computerised and manual files) in the Principal's Office at Malahide Community School. The school will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of the data and against their accidental loss or destruction. The school acknowledges that high standards of security are essential for processing all personal information.

Student records:

1. These may include information which may be sought and recorded at enrolment, and yearly re registration including: name, address and contact details, PPS number; names and addresses of parents/guardians and their contact details; religious belief; racial, ethnic or national origin; any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply.
2. Information on previous academic record Psychological assessments Cognitive Abilities Tests (CATs) & Diagnostic Abilities Tests (DATs), Results of New Group Reading Test (NGRT) and Numeracy tests conducted for SSE purposes.
3. Attendance Records Academic record – subjects studied, class assignments, examination results as recorded on official School reports Records of significant achievements.
4. Records of disciplinary issues and/or sanctions imposed.
5. Other records e.g. records of any serious injuries/accidents etc.

Purpose of Collecting Student Data:

The purpose/s for obtaining and holding these records is to enable each student to develop his/her full potential, to comply with legislative or administrative requirements, to ensure that eligible students can benefit from the relevant additional teaching or financial supports, to support the provision of religious instruction, to enable parent/guardians to be contacted in the case of emergency etc.

Each year, each recognised post primary school makes a return to the Department of Education and Skills, the data from which allow the Department of Education and Skills calculate the teaching posts and core funding to be allocated to each recognised post primary school, for the following school year. These returns are made in accordance with The Rules and Programme for Secondary Schools via a process called the Annual Post-Primary School October Return/Examination Entries, or more familiarly known as the October Returns via P-Pod Post Primary Online Database.

In making their respective returns to the Department, post primary schools transfer personal data and personal sensitive data on each of their enrolled students. The only purpose some post primary schools may collect some of these data is to meet the data requirements for their October Returns to the Department.

Sensitive Data:

Sensitive Data which may be sought at the time of enrolment includes membership of the travelling community and medical card information. This information is sought and retained for the purpose of completion of the October Returns. Explicit permission will be sought from parents/guardians before processing this data in line with DES C/L 47/2010. 5 2.

Records of students with Special Education Needs:

The school receives and retains a copy of student Psychological Reports which may include:

- Name, address and date of birth.
- PPS Number
- Psychological assessment (if supplied by school).
- Category of assessed disability and parent/guardian name and contact details.

Records of non-national students:

The school receives from other schools and retains details of the above students which may include:

Name, and date of birth, nationality and year of entry to Ireland .

Location:

These student records are kept in the offices at Malahide Community School.

Security:

Malahide Community School stores all personal information in controlled access, centralised databases (including computerised and manual files) in the offices at Malahide Community School. The school will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of the data and against their accidental loss or destruction. The school acknowledges that high standards of security are essential for processing all personal information.

CCTV Images/Recordings

(a) Categories: CCTV is installed in the school externally i.e. perimeter walls/fencing and internally. These CCTV systems may record images of staff, students and members of the public who visit the premises.

(b) Purposes: Safety and security of staff, students and visitors and to safeguard school property and equipment.

(c) Location: Cameras are located externally and internally. Recording equipment is located in the Deputy Principal's and Financial Comptroller's Office.

(d) Security: Access to images/recordings is restricted to the Principal & Deputy Principals of the school. Tapes, DVDs, hard disk recordings are retained for 28 days, except if required for the investigation of an incident.

Applying the Data Protection Principles to the Personal Data the Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons controlling and processing personal data.

Malahide Community School has key responsibilities in relation to the information which it keeps on computer or in structured manual files about individuals.

Data Protection Principles/Rules:

The school undertakes to execute its responsibilities in accordance with the eight Data Protection Principles/Rules as outlined below:

1. Obtain and process Personal Data fairly.

Malahide Community School will ensure that data subjects (staff, students & parents) are aware, at the time the personal data is being collected, of: the name of the school “data controller”; the purpose in collecting the data; the persons or categories of persons to whom the data may be disclosed; whether replies to questions asked are obligatory and the consequences of not providing replies to those questions; the existence of the right of access to their Personal Data; the right to rectify their data if inaccurate or processed unfairly; any other information which is necessary so that processing may be fair and to ensure the data subject has all the information that is necessary so as to be aware as to how their data will be processed. This will be achieved by adopting appropriate data protection notices at the point of data capture e.g. Staff Application forms, student enrolment forms.

While an express signature of indication of consent is not necessarily always required, it is strongly recommended, and will be requested, where possible. In the case of Sensitive Personal Data explicitly given consent will be requested unless it is necessary: to process the sensitive data in connection with an employment right or obligation; to prevent injury or other damage to the health of a person or otherwise to protect their vital interests; for the purpose of obtaining legal advice, or in connection with legal proceedings, or if necessary, for the purposes of establishing, exercising or defending legal rights; for medical purposes (more

extensive advice as to what constitutes medical purposes is available from www.dataprotection.ie) for the purpose of the assessment or payment of a tax liability; in relation to the administration of a Social Welfare scheme.

The minimum age at which consent can be legitimately obtained for processing and disclosure of Personal Data is not defined in the Data Protection Acts. However, the Data Protection Commissioner recommends, that,

“as a general rule in the area of education, a student aged eighteen or older may give consent themselves. A student aged from twelve up to and including seventeen should give consent themselves and, in addition, consent should also be obtained from the student's parent or guardian. In the case of students under the age of twelve consent of a parent or guardian will suffice.” www.dataprotection.ie

2. Keep it only for one or more specified, explicit and lawful purposes.

Malahide Community School will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes. Management and staff will be made aware of the purpose for which data is kept and ensure that it is not used for any purpose which may be incompatible with the original purpose.

3. Use and disclose it only in ways compatible with these purposes.

Malahide Community School will only use and disclose personal data in ways that are necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data.

Malahide Community School will ensure that staff/department involved in processing personal data are aware of the purpose of collecting such data and use/process it only for that specific purpose or compatible purpose/s.

For the purposes outlined above it may from time to time be necessary to disclose employee's personal information to third parties, including: the Department of Education & Skills, Revenue Commissioners, Department of Social Protection, the Central Statistics Office,

the Teaching Council, An Garda Síochána, other educational institutions, banks and other financial institutions, past and future employers, auditors, pension administrators, trade unions and staff associations or other. Student (and/or parent/guardian) data may be disclosed to third parties including: The Department of Education and Science (which includes the Inspectorate and the National Educational Psychological Service (NEPS), Child and Adolescent Mental Health Services CAMHS, Bus Eireann (in relation to school transport) & Universities/ Colleges /Institutes.

It may also be necessary to disclose information in order to comply with any legal obligations. Malahide Community School takes all reasonable steps as required by law to ensure the safety, privacy and integrity of the information and, where appropriate, enter into contracts with such third parties to protect the privacy and integrity of any information supplied. Malahide Community School will endeavour to comply with Department of Finance Guidelines in relation to the transfer of data to third parties.

4. Keep it safe and secure.

Malahide Community School stores all personal information in controlled access, centralised databases (including computerised and manual files) in the offices at Malahide Community School

The school will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of the data and against their accidental loss or destruction. The school acknowledges that high standards of security are essential for processing all personal information and endeavours to comply with the Department of Finance Guidelines which contains comprehensive guidelines regarding best practice in the area of data security.

Some of the security measures taken include: Access to files containing personal data (computerised and manual) is restricted to the staff who work in that particular area. Computer systems are password protected and are backed up daily to a secure server. The Offices are secured when not occupied. Waste paper which may include personal information

is confidentially shredded.

5. Keep it accurate and up-to-date.

Malahide Community School has procedures in place that are adequate to ensure high levels of data accuracy and completeness and to ensure that personal data is kept up to date. We rely on the individuals who supply personal information (staff, students and others) to ensure that the information provided is correct and to update us in relation to any changes to the information provided. Notwithstanding this, under Section 6 of the Data Protection Acts, individuals have the right to have personal information corrected if necessary. If an individual feels that the information held is incorrect they should write to the Principal.

6. Ensure that it is adequate, relevant and not excessive.

Personal data held by Malahide Community School will be adequate, relevant and not excessive in relation to the purpose/s for which it is kept. Periodic checking of files (electronic and manual) will be made to ensure that personal data held is not excessive and remains adequate and relevant for the purpose for which it is kept.

7. Retain it no longer than is necessary for the specified purpose or purposes.

Malahide Community School will have a defined policy on retention periods for personal data and appropriate procedures in place to implement such a policy. Malahide Community School retains student personal data on each student up to their 25th birthday/7 years after the completion of their studies and subject to review thereafter.

In setting retention periods for different sets of data, regard will be taken of the relevant legislative requirements, the possibility of litigation, the requirement to keep an archive for historical purposes and the retention periods laid down by funding agencies. Retention times cannot be rigidly prescribed to cover every possible situation and the school will exercise judgement, taking account of statutory obligation and best practice in this regard in relation to

each category of records held.

However, the following particular requirements should be met:

- The school registers and roll books are required to be kept indefinitely within the school.
- Pay, taxation and related employment records should be retained in accordance with the time periods set out in various Acts and Statutory Instruments governing taxation and employment law.
- Where litigation may potentially arise in the future (e.g. in relation to accidents/personal injuries involving employees/students or accidents occurring on school property), the relevant records should be retained until the possibility of litigation ceases.

8. Give a copy of his/her personal data to any individual, on request.

Data subjects have the right to periodically review, update and/or correct the information held about them. On making an access request any individual (subject to the restrictions in Notes A and B below) about whom Malahide Community School keeps Personal Data, is entitled to:

- a copy of the data which is kept about him/her know the purpose/s for processing his/her data know the identity of those to whom the data is disclosed
- know the source of the data, unless it is contrary to public interest know the logic involved in automated decisions a copy of any data held in the form of opinions, except in certain limited circumstances where such expression of opinion was given in confidence or on the understanding that it would be treated as confidential.
- If you are a student who is subject to estimated marks and you make a data access request to the school for your estimated marks before the issue of results, the school will advise the following:
 - that in line with section 56 of the Data Protection Act, it is not possible to respond to the request at present, and
 - that the request will be taken to have been made on the later of either the date of the first publication of the results of the 'examination' (i.e. the Accredited Grades process), or the date of the request.

To make an access request, an individual must: apply in writing to the Principal stating that

an Access Request is being made under Section 4 of the Data Protection Acts 1988-2003. Give any details which might be needed to help identify him/her and locate all the information the school may keep about him/her pay an access fee if the school wishes to charge one.

There are a number of exceptions to the general rule of Right of Access, including those specified in Notes A and B below.

Handling access requests:

1. The Principal will be nominated as the Coordinator responsible for handling access requests.
2. The Coordinator will check the validity of the access request, check that sufficient information has been provided to definitively identify the individual and that sufficient information to locate the data has been supplied.
3. The Coordinator will log the date of receipt of the valid request and keep a note of all steps taken to locate and collate the data.
4. The Coordinator will ensure that all relevant manual files and computers are checked for the data in respect of which the access request is made.
5. The Coordinator will ensure that the information is supplied promptly and within 40 days of receiving the request or, in respect of examinations data, within 60 days of receiving the request or 60 days of first publication of the results (whichever is the later).
6. Before supplying the information to the individual the Coordinator will check each item of data to establish if any of the modifications in respect of health or social work data (section 4(8)) or any of the restrictions on access provided by section 5 apply.
7. If data relating to a third party is involved, it will not be disclosed without the consent of the third party or the data will be anonymised in order to conceal the identity of the third party.
8. The Co-ordinator will ensure that the information is provided in a form which is clear to the ordinary person. 9. The individual will be informed within 40 days of the request if no information is held on them.

Exceptions to the general rule of Right of Access:

Note A: Access Requests by Students:

Age of Consent for Access Requests

In relation to access requests made by a student, the Office of the Data Protection Commissioner has recommended that the following guidance be followed as a general rule: A student aged eighteen years or older (and not suffering under any medical disability or medical condition which may impair his or her 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 his or her ability to understand the information, then parental/guardian consent will be sought by the school before releasing the data to the student.

A student aged from twelve 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, ie, it is suggested that:

If the information is ordinary, routine or non-controversial (eg. a record of a test result) the student could readily be given access.

If the information is of a sensitive nature, it would be prudent to seek parental/guardian consent in writing before releasing the data to the student. Where the parent/guardian does not give their consent to releasing the data to the student, legal advice should be sought.

If the information would be likely to be harmful to the individual concerned, parental/guardian consent should be sought before releasing the data to the student.

Copy to Parents where Students Make Access Request :

Where an access request is made by a student under 18 years, the school may choose to have a provision in the School's Data Protection Policy informing the student that:

- A. Where they make an access request, their parents will be informed that they have done so
- B. A complete copy of the access request materials being furnished to the data subject by the school will also be furnished to the student's parent/guardian.

Parental Access Requests

A parent/guardian may make an access request asking for their child's data. The school has to remember at all times that the right of access is a right of the data subject (ie, it is the student's right) and therefore the parent/guardian is making the request on behalf of the child. In such a case, the access materials should be sent to the child, not to the parent who requested them.

This means that the documentation should be sent to the address at which the child is registered on the school's records, and should be addressed to the child. The documentation should not be sent to or addressed to the parent/guardian who made the request.

Where parents are separated/estranged, it can be difficult for one parent to accept that they may have less involvement in their child's life. They may feel that they do not have all the information in relation to their child's life in school. Accordingly, the parent may see a section 4 access request as an opportunity to "look into the life of the child". As access materials are sent to the child themselves (not to the parent who made the request) the non-custodial parent may feel frustrated by the lack of information.

In such circumstances, the school may invite the parent to make an application under section 11 Guardianship of Infants Act 1964 which enables the court (on application by a guardian) to make a direction on any question affecting the welfare of the child. Where a court issues an order stating that a school should make certain information available to a parent, the school can release the data on foot of the court order.

Note B: Exceptions to note:

Data protection regulations prohibit the supply of: Health data to a patient in response to a request for access if that would be likely to cause serious harm to his or her physical or mental health. This is to protect the individual from hearing anything about himself or herself which would be likely to cause serious harm to their physical or mental health or emotional well-being. In the case of health data, the information can only be released after the school

has consulted with the appropriate health professional (usually the data subject's GP).

Personal Data obtained in the course of carrying on social work ("social work data") (personal data kept for or obtained in the course of carrying out social work by a Government department, local authority, TUSLA, CALMS, HSE etc) is also restricted in some circumstances if that would be likely to cause serious harm to the health or emotional condition of the data subject concerned. In the case of social work data, the information cannot be supplied at all if the school believes it would be likely to cause serious harm to the physical or mental health or emotional condition of the data subject. If the social work data includes information supplied to the school by an individual (other than one of the school's employees or agents) while carrying out social work, the school is not permitted to supply that information to the data subject without first consulting that individual who supplied the information.

The Data Protection Acts state that the following data is exempt from a data access request:

1. Section 5 of the Data Protection Act provides that the right of access does not apply in a number of cases in order to strike a balance between the rights of the individual, on the one hand, and some important needs of civil society on the other hand. Examples would include the need for State Agencies (like An Garda Síochána) to investigate crime effectively, and the need to protect the international relations of the State.
2. Estimates of liability: where the personal data consists of or is kept for the purpose of estimating the amount of the liability of the school on foot of a claim for damages or compensation, and where releasing the estimate would be likely to prejudice the interests of the school in relation to the claim, the data may be withheld.
3. Legally privileged information: the general rule is that all documentation prepared in contemplation of litigation is legally privileged. So correspondence between the school and their solicitors in relation to a case against the school should not be disclosed to the claimant pursuant to a data access request.
4. Section 4 states that the right of access does not include a right to see personal data about another individual, without that other person's consent. This is necessary to

protect the privacy rights of the other person. If it is reasonable for the school to conclude that redacting or omitting the particulars identifying the third party would both conceal the identity of the third party, and enable the data to be disclosed (subject to the redactions), then the data could be disclosed with 12 such redactions. However, if it is not possible to redact or omit the particulars which identify a third party, then the affected data should not be released to the applicant.

5. Section 4 also states that where personal data consists of expressions of opinion about the data subject made by another person, the data subject has a right to receive that expression of opinion except where that expression of opinion was given in confidence, and on the clear understanding that it would be treated as confidential.
 6. The obligation to comply with an access request does not apply where it is impossible for the school to provide the data or where it involves a disproportionate effort.
 7. Where the school refuses to hand over some or all of the personal data they hold in relation to a data subject (on the basis of any of the exemptions or prohibitions set out above), the school will advise the data subject of this in writing, setting out reasons for the refusal, and notifying the data subject that he or she has the right to complain to the Office of the Data Protection Commissioner about the refusal
- Implementation Arrangements, Roles and Responsibilities

The Principal of Malahide Community School and delegated Officers are responsible for implementing this policy.

However all employees who collect and/or control the contents and use of personal data are individually responsible for compliance with the data protection legislation. The school will provide support, advice and training to all staff concerned to ensure compliance with the legislation.

Ratification, Communication, Implementation & Review:

Ratification & Communication

This Policy was adopted by the Board of Management of Malahide Community School at its _____ meeting.

The policy will be brought to the attention of new members of staff, new students and their parents via the inclusion of appropriate wording on application and enrolment forms.

Implementation Date:

The date from which the Policy applied is _____ which is the date of adoption by the Board of Management of Malahide Community School.

Monitoring the Implementation of the Policy:

The implementation of the Policy will be monitored by the Principal and delegated officers of Malahide Community School.

Reviewing and evaluating the Policy:

The Policy will be reviewed and evaluated from time to time. Ongoing review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills & the NEWB), legislation and feedback from parents/guardians, students, School staff and others.

We rely on parents/guardians to provide us with accurate and complete information and to update us in relation to any change in the information provided. Should you wish to update or access your/your child's personal data you should write to the school Principal, Malahide Community School.