



# Lycée Français d'Irlande

## Data Protection Policy

<b>ORGANISATION:</b>	Lycée Français d'Irlande
<b>POLICY APPLIES TO:</b>	<u>Collège et Lycée:</u> Lycée Français d'Irlande, Roebuck Road, Dublin 14 <u>Maternelle et Élémentaire:</u> Lycée Français d'Irlande, Foxrock Avenue, Dublin 18
<b>LOCATION:</b>	Roebuck Road, Dublin 14
<b>PRIVACY COORDINATOR:</b>	John Coleman
<b>AUTHORISED BY:</b>	Board of Management of Lycée Français d'Irlande
<b>AUTHORISED DATE:</b>	
<b>REVIEW DATE:</b>	

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## **Introductory statement**

The Data Protection Policy of Lycée Français d'Irlande (also referred to in this policy as “the school”) applies to the personal data held by the school protected by the General Data Protection Regulation 2016/679 (referred to as “GDPR”).

The policy applies to all school staff, the Board of Management, parents/guardians, students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the school) insofar as the measures under the policy relate to them. Data will be stored securely, so that confidential information is protected in compliance with relevant legislation. This policy sets out the manner in which personal data and sensitive personal data will be collected, processed, stored and protected by the school.

## **Data Protection Principles**

The school is a data controller of personal data relating to its past, present and future staff, students, parents/guardians and other members of the school community. The school is obliged to comply with the principles of data protection set out in GDPR which can be summarised as follows:

- To obtain and process personal data fairly, lawfully and in a transparent manner: information on students is gathered with the help of parents/guardians and staff, and is also transferred from their previous schools. In relation to information the school holds on other individuals (members of staff, individuals applying for positions within the school, parents/guardians of students etc.), the information is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their employment or contact with the school. All such data is treated in accordance with data protection law and the terms of this Data Protection Policy. The information will be obtained and processed fairly.
- To collect personal data for one or more specified, explicit and legitimate purpose: the school informs individuals of the reasons for collecting their data and will inform individuals of the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.
- To process personal 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. Information will only be disclosed on a need to know basis, and access to it will be strictly controlled.
- To ensure that personal data is adequate, relevant and limited to what is necessary: only the necessary amount of information required to provide an adequate service will be gathered and stored.
- To keep personal data accurate, complete and up-to-date: students, parents/guardians, and/or staff should inform the school of any change that the school should make to their personal data and/or sensitive personal data to ensure that the data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records. The Principal may delegate such updates/amendments to another member of staff. However, records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of such authorisation and the alteration(s) to be made to any original record/documentation will be dated and signed by the person making that change.

- To keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the information is processed: as a general rule, the information will be kept for the duration of the individual's time in the school. Thereafter, the school will comply with the school's Records Retention Policy on the storage of personal data and sensitive personal data relating to a student. In the case of members of staff, the school will comply with the requirements of the Revenue Commissioners with regard to the retention of records relating to employees. The school may also retain the data relating to an individual for a longer length of time for the purposes of complying with relevant provisions of law and or/defending a claim under employment legislation and/or contract and/or civil law. The school may also retain the data beyond the normal periods listed in the schedule for archiving purposes to accurately record the history of the school.
- To keep personal data safe and secure: Only those with a genuine reason for doing so may gain access to the information. Sensitive personal data is securely stored under lock and key in the case of manual records, and protected with firewall software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) will be encrypted and password protected before they are removed from the school premises.

## Scope

Purpose of the policy: the GDPR applies to the keeping and processing of personal data, in both manual and electronic form. The purpose of this policy is to assist the school to meet its statutory obligations, to explain those obligations to school staff, and to inform staff, students, parents/guardians, Board and Committee members and other data subjects how their data will be treated.

The policy applies to all school staff, the Board of Management, parents/guardians, students and other data subjects (including prospective or potential students and their parents/guardians, and applicants for staff positions within the school) insofar as the school handles or processes their personal data in the course of their dealings with the school.

## Definition of data protection terms

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

**Data** means information in a form that can be processed. It includes both automated data (e.g. electronic 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 kept/recorded as part of a relevant filing system or with the intention that it form part of a relevant filing 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, quickly and easily accessible.

**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 Data Controller i.e. the school.

**Sensitive personal data** refers to personal data regarding a person's:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data
- health data
- data concerning a natural person's sex life or sexual orientation

**The Data Controller** for the purpose of this policy is the Board of Management, Lycée Français d'Irlande, Roebuck Road, Dublin.

**Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data.

**Consent:** means 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.

#### **Rationale**

In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the **GDPR**.

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared. 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.

The school takes its responsibilities under data protection law very seriously and wishes to put in place safe practices to safeguard individuals' personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information, enabling the Principal and Board of Management to make decisions in respect of the efficient running of the school. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the school and Board of Management.

#### **Relationship to characteristic spirit of the school (school's mission/vision/aims)**

Lycée Français d'Irlande seeks to:

- enable students to develop their full potential
- provide a safe and secure environment for learning
- promote respect for the diversity of values, beliefs, traditions, languages and ways of life in society.

We aim to achieve these goals while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us.

## Personal data

The personal data records held by the school are divided into the following:

- A. Staff records
- B. Student records
- C. Parent/Guardian records
- D. Board of Management records
- E. Committee member records
- F. Host family records
- G. Other records

### A. Staff records:

- (a) **Categories of data:** As well as existing members of staff (and former members of staff), these records may also relate to applicants applying for positions within the school, trainee teachers and teachers under probation.

These staff records may include:

- Name, address and contact details, PPS number, date of birth
- Occupation
- Taxation status
- Record of appointments to promotion posts
- Records of salary grade
- Records of teaching registration
- Records of Garda vetting
- Records of staff contracts
- Bank account details
- Images of staff engaged in school activities or events
- Images and recordings of staff on CCTV
- Images used on the school website and other social media platforms used by the school such as Facebook and Twitter
- Original records of application and appointment to posts or promotion
- Details of approved absences (career breaks, parental leave, study leave etc.)
- Details of work record (qualifications, classes taught, subjects etc.)
- Details of any accidents/injuries sustained on school property or in connection with staff members carrying out their school duties
- Records of any reports the school (or its employees) has made in respect of staff members under mandatory reporting legislation and/or child-safeguarding guidelines.

- (b) **Purposes:** Staff records are kept for the purposes of:

- the management and administration of school business (now and in the future)
- facilitating the payment of staff, and calculating other benefits/ entitlements (including reckonable service for the purpose of the calculation of pension payments, entitlements and/or redundancy payments where relevant)
- facilitating pension payments in the future
- human resources management
- keeping historical records for archive purposes on the history of the school
- recording promotions made (documentation relating to promotions applied for) and changes in responsibilities etc.

- enabling the school 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)
  - use as evidence for the purpose of disciplinary action if there has been a breach of employment policies or procedures, or any other misconduct (CCTV recordings)
  - maintaining the school website and other social media platforms with up-to-date details of staff within the school.
- (c) **Location:** In a secure, locked filing cabinet in the HR manager’s office 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.
- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.
- (e) **Lawful basis for processing:**  
The legal obligation for information such as deductions of income tax, or the performance of a contract for certain types of information in order to fulfil our obligations as an employer.

## **B. Student records:**

(a) **Categories of data:** These may include:

- Information which may be sought and recorded on application or enrolment, and may be collated and compiled during the course of the student’s time in the school. These records may include:
  - name, address and contact details, PPS number
  - date and place of birth
  - nationality
  - names and addresses of parents/guardians and their contact details (including any special arrangements with regard to guardianship, custody or access)
  - religious belief
  - racial or ethnic origin
  - any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply
- Information on previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student
- Attendance records
- Class lists
- Photographs and recorded images of students (including at school events, engaged in school activities and noting achievements)
- Images and recordings of students on CCTV
- Academic record – subjects studied, class assignments, examination results as recorded on official school reports
- Records of significant achievements
- Whether the student is repeating the Leaving Certificate
- Records of disciplinary issues/investigations and/or sanctions imposed
- Garda vetting outcome record (where students are engaged in work experience organised with or through the school that requires that they be Garda vetted)
- Other records e.g. records of any serious injuries/accidents etc.

- Records of any reports the school (or its employees) has made in respect of the student to agencies under mandatory reporting legislation and/or child safeguarding guideline.

(b) **Purposes:** The purposes for keeping student records are:

- to enable students to develop to their full potential
- to comply with legislative or administrative requirements
- to ensure that eligible students can benefit from relevant additional teaching or financial supports
- to support the provision of religious instruction
- to enable parents/guardians to be contacted in 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 celebrate school achievements, compile yearbooks, establish a school website, record school events, and keep a record of the history of the school (photographs and recorded images of students)
- to ensure that students meet the school's admission criteria
- to ensure that students meet the minimum age requirements for their course
- to ensure that the school can assess the coordination of suitable care of students in a way that best supports the individual needs of students
- to furnish documentation/ information about students to the French Embassy or AEFÉ
- 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 maintain the school website, any school apps and school presence on social media platforms such as Facebook and Twitter in order to celebrate achievement of students and to promote the school
- to carry out general school administration services, such as the preparation and distribution of class lists for use by staff and fellow students, lists of parent representatives, lists for school activities, lists for school trips and outings and any other such lists required during the course of providing school activities.

In respect of work experience placements that require that the students be Garda vetted, the school will assist students in obtaining their Garda vetting outcome (with the consent of the student and the student's parent/guardian) in order to furnish a copy of same (with the consent of the student and the student's parent/guardian) to the work experience employer

(c) **Location:** In a secure, locked filing cabinet 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.

(d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms and are only accessed by authorised personnel. Computer data is password protected with firewall software ensuring an appropriate level of technical security.

(e) **Lawful basis for processing:**

Legal basis for some information.

For the performance of a contract for certain types of information.

To protect a pupil's vital interest.



## C. Parent/guardian details

- **Categories of data:** These may include:
  - Contact details such as:
    - Name, address (home and work), email address, phone number/s (home and work), occupation, nationality
  - Legal status of parents/guardians vis a vis the pupil (including any special arrangements with regard to guardianship, custody or access)
  - During any visit to the school, images may be recorded on CCTV.
- (b) **Purpose:** The personal data of parents/guardians will be used for such purposes as:
  - to complete school forms
  - to allocate of teachers and resources to the school
  - the administration of examinations
  - general school administration
  - child welfare (including medical welfare)
  - to fulfil our legal obligations
  - to issue information about activities/trips
  - to advise on dates/times of parent teacher meetings
  - to notify parents/guardians of school events
  - to notify parents/guardians of school closures (e.g. in cases of adverse weather conditions)
  - to notify parents/guardians of their child's non-attendance or late attendance or any other issues relating to their child's conduct in school
  - to communicate with parents/guardians in relation to their child's social, emotional and educational progress
  - to contact parents/guardians in the case of an emergency concerning their child
  - to send any other relevant information concerning the school
- (c) **Location:** In student files stored in cabinets in locked offices only accessible by authorised personnel. Data is also stored electronically in the school databases or on files on our file server. Employees are required to maintain the confidentiality of any data to which they have access.
- (d) **Security:** Manual files are kept in filing cabinets in locked rooms. Computer records are password protected and have firewall software ensuring an appropriate level of technical security.
- (e) **Lawful basis for processing:** The performance of a contract for certain types of information required for admissions. Processing is necessary for compliance with a legal obligation.

## D. Board of Management records:

- (a) **Categories of data:** These 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 that may include references to particular individuals.

- (b) **Purposes:** To enable the Board of Management to operate in accordance with applicable legislation and to maintain a record of board appointments and decisions; to keep historical records for archive purposes on the history of the school.
- (c) **Location:** In a secure, locked filing cabinet 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.
- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.
- (e) **Lawful basis for processing:** Legal obligation

## **E. Committee member records**

- (a) **Categories of committee member data:** These may include:
  - Name, address and contact details of each committee member (including former committee members)
  - Records in relation to appointments to committees
  - Minutes of committee meetings and correspondence that may include references to particular individuals.
- (b) **Purpose:** To enable the school to operate various committees to assist in the running of the school and in ancillary matters such as fundraising; to keep historical records for archive purposes on the history of the school.
- (c) **Location:** In a secure, locked filing cabinet 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.
- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.
- (e) **Lawful basis for processing:** Legal obligation

## **F. Host Family Records**

- (a) **Categories of data:** These may include:
  - General information such as: name, address, phone number/s, email address
  - Financial information such as: bank details
  - Other information such as: Garda vetting details for all family members over 16
- (b) **Purpose:** To enable the school to operate the host family programme whereby students can stay with families located in the area.
- (c) **Location:** In a secure, locked filing cabinet 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.

- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.
- (e) **Lawful basis for processing:** The performance of a contract.

## **G. Other records:**

The school will hold other records relating to individuals. The formats in which these records will be kept are manual record (personal file within a relevant filing system), and/or computer record (database). Some examples of the type of other records that the school will hold are set out below (this list is not exhaustive):

### **I. Creditors**

- (a) **Categories of data:** the school may hold some or all of the following information about creditors (some of whom are self-employed individuals):
  - name
  - address
  - contact details
  - PPS number
  - tax details
  - bank details and
  - amount paid.
- (b) **Purposes:** 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.
- (c) **Location:** In a secure, locked filing cabinet 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.
- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.
- (e) **Lawful basis for processing:** The performance of a contract

### **II. CCTV images/recordings**

- (a) **Categories:** CCTV is installed in Lycée Français d'Irlande, Roebuck Road, Dublin at the school entrance, in the parking area, in stairwells and in corridors, and in Lycée Français d'Irlande, Foxrock, Dublin in the yard and the parking area (see our CCTV Policy). 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 as detailed in the CCTV Policy.
- (d) **Security:** CCTV recordings in the secondary school are stored and processed by St. Kilian's Deutsche Schule under a Data Processing Agreement. CCTV records in the primary school are

securely stored on the premises. See our CCTV Policy for further details on security and retention and access.

- (e) **Lawful basis for processing:** Legitimate interest.

### III. Examination results

- (a) **Categories:** The school will hold data comprising examination results in respect of its students. These include class, mid-term, annual, continuous assessment and other examinations results.
- (b) **Purposes:** The main purpose for which these examination results and other records are held is to monitor a student's progress and to provide a sound basis for advising them and their parents or guardians about subject choices and levels. The data may also be aggregated for statistical/reporting purposes, such as to compile results tables. The data is transferred to the AEFE.
- (c) **Location:** In a secure, locked filing cabinet 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.
- (d) **Security:** Records are kept in both manual and computer format. Manual files are kept in filing cabinets in locked rooms. Computer data is password protected with firewall software.

### Processing in line with data subject's rights

Data in the school will be processed in line with the data subjects' rights. Articles 12 to 23 of the GDPR relate to the rights of the data subject including:

#### **The right to have personal information processed in a concise, transparent, intelligible and easily accessible form, using clear and plain language**

- Procedures are in place to ensure that all persons from whom personal data is obtained are made aware of the processing carried out by Lycée Français d'Irlande, Roebuck Road, Dublin and that all information relating to such processing is provided in clear and plain language.
- Recital 58 of the GDPR states that "*Given that children merit specific protection, any information and communication, where processing is addressed to a child, should be in such a clear and plain language that the child can easily understand.*" We ensure that we adhere to this recital.
- Personal information is processed fairly in accordance with the GDPR, with consent being obtained from staff members, parents/guardians or students, where required.
- Sensitive personal information is processed fairly in accordance with the GDPR, with explicit consent being obtained from parents/guardians or students, where required.
- Consent is sought for the use of images and videos where students are participating in school activities or events. Pupils who do not have consent will not be excluded from any school activities. However, we reserve the right to blur the faces of students for whom we do not have appropriate consent if they are captured as part of a group of children who have been given the appropriate consent. We will ensure that children for whom we do not have the appropriate consent will not be identifiable.

## **The right to be informed**

- We ensure that all individuals from whom data is collected are made aware of what data we are using and why and for what purpose we are using it, as well as informing them of the details of any third parties in receipt of their data.
- School management is aware of the different sets of data which are kept and the specific purpose of each.

## **The right of access**

All individuals are entitled to a copy of all the data the school holds about them. Individuals on whom the school keeps personal data are entitled:

- to a copy of the data kept about them
- to know the purpose/s for processing their data
- to know the identity of those to whom the data is disclosed
- to know the source of the data, unless it is contrary to public interest
- to know the logic involved in automated decisions
- to a copy of any data held in the form of opinions, except where such opinions were given in confidence.

To make an access request, individuals must:

- apply in writing
- provide relevant identification
- give any details which might be needed to help identify them and locate all the information kept about them

Individuals have the right to lodge a complaint with the Data Protection Commissioner if they feel their rights are being infringed in some way by the school in its processing activities.

## **The right of rectification**

- If Lycée Français d'Irlande holds data about an individual that is incorrect, then that individual has the right to have that data corrected.

## **The right to erasure (or the right to be forgotten)**

- This means that individuals have the right to request the erasure of their personal data. However, in many cases, the school will have overriding legitimate grounds for continued processing and will be unable to comply with such a request. This will be handled on a case by case basis.

## **The right to restrict processing**

- This means that individuals can ask the school to stop using their data and the school must comply unless we have an overriding legitimate lawful purpose for continuing to process the data. This will be handled on a case by case basis.

## The right to data portability

- This means that individuals have the right to move their data to another processor (in this case, another school) and we must comply with this request.

## The right to object

- Any person whose data is processed by the school has the right to object to further processing and we must comply unless we have an overriding legitimate reason to continue processing. This will be handled on a case by case basis.

## Dealing with a data access requests

Under Article 15 of the GDPR, individuals have the right to be informed whether the school holds data/information about them and to be given a description of the data together with details of the purposes for which their data is being kept. They must make this request in writing and the Data Controller will accede to the request within one month, having first verified the identity of the requester to ensure the request is legitimate.

Some points to note regarding access requests:

- Individuals are entitled to a copy of their personal data
- Requests must be responded to within one month
- Where a subsequent or similar request is made soon after a request has just been dealt with, it is at the discretion of the school as Data Controller to comply with the second request. This will be determined on a case-by-case basis.
- 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. Data will be carefully redacted to omit references to any other individual and only where it has not been possible to redact the data to ensure that the third party is not identifiable will the school refuse to furnish the data to the applicant.

For full details on making an access request, please refer to the school's Data Access Request Procedure document on our website and download the Data Access Request Form there. We would ask all requesters to complete this form, though it is not mandatory.

## Handling access requests

On production of a written request and relevant identification, access will be granted to personal data. There is a procedure in place to record the outcome of any legal proceedings which may limit the right of one or both parents to access information about their child.

**Note:** If spouses are separated and one of them has obtained an order for custody but both of them remain guardians, then both of them are entitled to be involved in important decisions which affect the child.

A clear co-ordinated procedure is in place to ensure that all relevant manual files and computers are checked for the data in respect of which the access request is made, provided that there is no overriding legitimate purpose which will prevent the school from complying with such a request.

## Access requests by students

Students aged 18 and over are entitled to access their personal information in accordance with the GDPR.

Students under 18 years of age can be given access to their personal information, depending on the age of the student and the nature of the record:

- if the information is ordinary, routine or non-controversial (e.g. a record of a test result) the student could readily be given access
- consent is sought through the guidance service if the record is of a sensitive nature
- parental/guardian consent is sought if the student has some disability or medical condition that would impair his or her ability to understand the information or if disclosure would be likely to be harmful to the individual concerned

### 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 cause serious harm to his or her physical or mental health. The regulations also provide that such data is to be communicated only by, or after consultation with, an appropriate health professional, normally the patient's own doctor.
- Personal data obtained in the course of carrying out social work if that would cause serious harm to the health or emotional condition of the data subject concerned.

## Data Breaches

Article 4(12) GDPR defines a 'personal data breach' as:

*"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"*.

The school may suffer a breach for a number of reasons including:

- the disclosure of confidential data to unauthorised individuals;
- improper disposal of documents;
- loss or theft of data or equipment on which data is kept;
- loss or theft of paper records;
- inappropriate access controls allowing unauthorised use of information;
- suspected breach of the school's IT security;
- attempts to gain unauthorised access to computer systems, e.g. malicious hacking;
- viruses or other security attacks on the school's IT systems or networks;
- breaches of physical security;
- breaches as a result of third-party breach;
- confidential information left unlocked in accessible areas; and
- emails containing personal or sensitive information sent in error to the wrong recipient.

Staff are trained to recognise a breach and are instructed to inform the Privacy Coordinator immediately if they suspect a breach has occurred.

The school has a Personal Data Breach Procedure in place which will be followed by the relevant staff members in the event of a breach's being reported either internally or by a third-party processor.

#### **Providing information over the phone**

In our school, any employee dealing with telephone enquiries should be careful about disclosing any personal information held by the school over the phone. In particular the employee should:

- Check the identity of the caller to ensure that information is only given to a person who is entitled to that information
- Suggest that the caller put their request in writing if the employee is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified
- Refer the request to the Principal for assistance in difficult situations. No employee should feel forced into disclosing personal information.

#### **Data transfers and data sharing**

We do not sell any personal information, nor do we share it with unaffiliated third parties unless we are required to do so by law.

Ways in which we may share your personal information with external bodies or organisations or other third parties include:

- To engage the professional services of third parties, such as our accountants, solicitors or other business advisers. Any such parties are bound by confidentiality;
- With our insurers or assessors when providing or reviewing information in the event of an incident occurring;
- To furnish documentation/ information to TUSLA in cases where we deem this necessary;
- To report to law enforcement any activities that we, in good faith, believe to be illegal;
- To provide information to An Garda Síochána or other government bodies or agencies when required to do so by law;
- To ensure the security of our IT systems in order to protect the data we hold;
- To meet the educational needs of our students where tuition is provided by another school, currently St.Kilian's Deutsche Schule, Roebuck Road, Dublin 14. The sharing of personal information between schools is done under a data sharing agreement to ensure adequate levels of protection in compliance with the GDPR; and
- With the *Agence pour l'enseignement français à l'étranger* (AEFE) under a confidentiality agreement.

#### **Implementation arrangements, roles and responsibilities**

In our school the Board of Management is the Data Controller and the Principal will be assigned the role of co-ordinating implementation of this Data Protection Policy together with the Privacy Coordinator, and of ensuring that staff who handle or have access to personal data are familiar with their data protection responsibilities.



The following personnel have responsibility for implementing the Data Protection Policy:

<b>Name</b>	<b>Responsibility</b>
Board of Management:	Data Controller
Principal:	Implementation of policy
Privacy Coordinator:	Handle any data protection queries from data subjects
Teaching personnel:	Awareness of responsibilities
Administrative personnel:	Security, confidentiality
IT personnel:	Security, encryption, confidentiality

### **Ratification and communication**

When the Data Protection Policy has been ratified by the Board of Management, it becomes the school's agreed Data Protection Policy. It should then be dated and circulated within the school community. The entire staff must be familiar with the Data Protection Policy and ready to put it into practice in accordance with the specified implementation arrangements. It is important that everyone concerned be made aware of any changes implied in recording information on students, staff and others in the school community.

Parents/guardians and students should be informed of the Data Protection Policy from the time of enrolment of the student e.g. by including the Data Protection Policy as part of an enrolment pack, by either enclosing it or incorporating it as an appendix to the enrolment form.

### **Monitoring the implementation of the policy**

The implementation of the policy shall be monitored by the Principal and the Privacy Coordinator.

At least one annual report should be issued to the Board of Management to confirm that the actions/measures set down under the policy are being implemented.

### **Reviewing and evaluating the policy**

The policy should be reviewed and evaluated by the Board of Management annually and as necessary. On-going review and evaluation should take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner), legislation and feedback from parents/guardians, students, school staff and others. The policy should be revised as necessary in the light of such review and evaluation and within the framework of school planning.

**SIGNED** on behalf of the Board of Management of **Lycée Français d'Irlande**

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Signature

\_\_\_\_\_

Position

\_\_\_\_\_

Print Name

\_\_\_\_\_

Date