



**Edmund Rice College**

**Carrigaline**

**Data Protection Policy**

Formulated

Academic Year 2016/17

## Introductory Statement

The school's Data Protection Policy applies to the personal data held by the school which is protected by the Data Protection Acts 1988 and 2003.

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 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. As such, the 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:** Information on students is gathered with the help of parents/guardians and staff. Information 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 the Data Protection Acts and the terms of this Data Protection Policy. The information will be obtained and processed fairly.
- **Keep it only for one or more specified and explicit lawful purposes:** The School will inform individuals of the reasons they collect 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.
- **Process it only in ways compatible with the purposes for which it was given initially:** Data relating to individuals will only be processed in a manner consistent with the purposes for which it was gathered. Information will only be disclosed on a need to know basis, and access to it will be strictly controlled.
- **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) should be password protected before they are removed from the school premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data. 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.

- **Keep personal data accurate, complete and up-to-date:** Students, parents/guardians, and/or staff should inform the school of any change which should be made to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the school will make all necessary changes to the relevant records.
- **Ensure that it is adequate, relevant and not excessive:** Only the necessary amount of information required to provide an adequate service will be gathered and stored.
- **Retain it no longer than is necessary for the specified purpose or purposes for which it was given:** 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 DES guidelines 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 both DES guidelines and 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.
- **Provide a copy of their personal data to any individual, on request:** Individuals have a right to know what personal data/sensitive data is held about them, by whom, and the purpose for which it is held.

The school is guided in its practice by its Records Management Procedures (Appendix I) and also by its Filing Guidelines (Appendix II). The length of time records are held are determined by the Records Retention Schedule (Appendix III).

## **Purpose of the Policy:**

The Data Protection Acts 1988 and 2003 apply to the keeping and processing of personal data, both in 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 and their parents/guardians how their data will be treated.

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 school handles or processes their personal data in the course of their dealings with the school.

## **Definition of Data Protection Terms**

In order to properly understand the school's obligations, 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 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 any proceedings for an offence committed or alleged to have been committed by the person, the disposal of such proceedings or the sentence of any court in such proceedings, criminal convictions or the alleged commission of an offence.
- **Data controller** for the purpose of this policy is the board of management, Edmund Rice College, Carrigaline.

## **Rationale**

In addition to its legal obligations under the broad remit of educational legislation, the school has a legal responsibility to comply with the Data Protection Acts, 1988 and 2003.

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 individual's 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.

## **Other Legal Obligations**

Implementation of this policy takes into account the school's other legal obligations and responsibilities. Some of these are directly relevant to data protection. For example:

- Under Section 9(g) of the Education Act, 1998, the parents of a student, or a student who has reached the age of 18 years, must be given access to records kept by the school relating to the progress of the student in their education.
- Under Section 20 of the Education (Welfare) Act, 2000, the school must maintain a register of all students attending the school.
- Under section 20(5) of the Education (Welfare) Act, 2000, a principal is obliged to notify certain information relating to the child's attendance in school and other matters relating to the child's educational progress to the principal of another school to which a student is transferring.
- Under Section 21 of the Education (Welfare) Act, 2000, the school must record the attendance or non-attendance of students registered at the school on each school day.
- Under Section 28 of the Education (Welfare) Act, 2000, the school may supply personal data kept by it to certain prescribed bodies (the Department of Education and Skills, the National Education Welfare Board, the National Council for Special Education, other schools, other centres of education) provided the school is satisfied that it will be used for a "relevant purpose" (which includes recording a person's educational or training history or monitoring their educational or training progress in order to ascertain how best they may be assisted in availing of educational or training opportunities or in developing their educational potential; or for carrying out research into examinations, participation in education and the general effectiveness of education or training).
- Under Section 14 of the Education for Persons with Special Educational Needs Act, 2004,

the school is required to furnish to the National Council for Special Education (and its employees, which would include Special Educational Needs Organisers (“SENOs”)) such information as the Council may from time to time reasonably request

- The Freedom of Information Act 1997 provides a qualified right to access to information held by public bodies which does not necessarily have to be “personal data” as with data protection legislation. While schools are not currently subject to freedom of information legislation, if a school has furnished information to a body covered by the Freedom of Information Act (such as the Department of Education and Skills, etc.) these records could be disclosed if a request is made to that body.
- Under Section 26(4) of the Health Act, 1947 a school shall cause all reasonable facilities (including facilities for obtaining names and addresses of pupils attending the school) to be given to a health authority who has served a notice on it of medical inspection, e.g. a dental inspection.
- Under Children First: National Guidance for the Protection and Welfare of Children (2011) published by the Department of Children & Youth Affairs, schools, their boards of management and their staff have responsibilities to report child abuse or neglect to TUSLA - Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána).

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

Edmund Rice College, Carrigaline, seeks through its ethos and by reference to the ERST Charter, to

- enable each student 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.

The school aims to achieve these goals while respecting the privacy and data protection rights of students, staff, parents/guardians and others who interact with us. The school wishes to achieve these aims/missions while fully respecting individuals’ rights to privacy and rights under the Data Protection Acts.

### **Personal data**

The personal data records held by the school may include:

#### **A. Staff records:**

(a) Categories of staff 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
- Original records of application and appointment to promotion posts
- 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 the staff member carrying out their school duties
- Records of any reports the school (or its employees) have made in respect of the staff member to State departments and/or other agencies under mandatory reporting legislation and/or child-safeguarding guidelines (subject to the DES Child Protection Procedures).

(b) **Purposes:** 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, and calculate other benefits/ entitlements (including reckonable service for the purpose of calculation of pension payments, entitlements and/or redundancy payments where relevant)
- To facilitate pension payments in the future
- Human resources management
- Recording promotions made (documentation relating to promotions applied for) and changes in responsibilities etc.
- To enable 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)
- To enable the school to comply with requirements set down by the Department of Education and Skills, the Revenue Commissioners, the National Council for Special Education, TUSLA, the HSE, and any other governmental, statutory and/or regulatory departments and/or agencies
- And for compliance with legislation relevant to the school.

(c) **Location:** In filing cabinets in secure, locked offices 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:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

## **B. Student records:**

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

- Information which may be sought and recorded at 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
  - 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
  - Membership of the Traveller community, where relevant
  - Whether they (or their parents) are medical card holders
  - Whether English is the student's first language and/or whether the student requires English language support
  - 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)
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at school events and noting achievements). The school is guided in this regard by the information on <http://www.dataprotectionschools.ie/en/Data-Protection-Guidelines/Taking-Using-Images-Photos/Guidelines-for-taking-and-using-images-of-pupils-in-schools/>
- 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
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- Garda vetting outcome record (where the student is engaged in work experience organised with or through the school which requires that they be Garda vetted)
- Other records e.g. records of any serious injuries/accidents etc. (Note: it is advisable to inform parents that a particular incident is being recorded).
- Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).

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

- To enable each student to develop to their 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 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
- Photographs and recorded images of students are taken to celebrate school achievements, compile yearbooks, establish a school website, record school events, and to keep a record of the history of the school. The school is guided in this regard by the information on <http://www.dataprotectionschools.ie/en/Data-Protection-Guidelines/Taking-Using-Images-Photos/Guidelines-for-taking-and-using-images-of-pupils-in-schools/>
- To ensure that the student meets the school's admission criteria
- To ensure that students meet the minimum age requirements for their course,
- To ensure that any student seeking an exemption from Irish meets the criteria in order to obtain such an exemption from the authorities
- To furnish documentation/ information about the student to the Department of Education and Skills, the National Council for Special Education, TUSLA, and other Schools etc. in compliance with law and directions issued by government departments
- To furnish, when requested by the student (or their parents/guardians in the case of a student under 18 years) documentation/information/ references to third-level educational institutions and/or prospective employers
- In respect of a work experience placement, (where that work experience role requires that the student be Garda vetted) the School will assist the student in obtaining their Garda vetting outcome (with the consent of the student and their 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 filing cabinets in secure, locked offices that only personnel who are authorised to use the data can access. In Teacher Handbooks stored securely by individual teachers. Employees are required to maintain the confidentiality of any data to which they have access.

(d) **Security:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

### **C. Board of Management Records:**

(a) **Categories of board of management 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 which may include references to particular individuals.

(b) **Purposes:** 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.

(c) **Location:** In filing cabinets in secure, locked offices 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:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

### **D. Other records:**

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

#### **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

- 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 filing cabinets in secure, locked offices 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:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

### **Charity tax-back forms**

(a) **Categories of data:** the school may hold the following data in relation to donors

who have made charitable donations to the school:

- Name
- Address
- Telephone number
- PPS number
- Tax rate
- Signature
- Gross amount of the donation.

(b) **Purposes:** Schools are entitled to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY2) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation. The information requested on the appropriate certificate is the parents name, address, PPS number, tax rate, telephone number, signature and the gross amount of the donation. This is retained by the School in the case of audit by the Revenue Commissioners.

(c) **Location:** In filing cabinets in secure, locked offices 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:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

## **CCTV images/recordings**

- (a) **Categories:** CCTV is installed in the school, externally outside the main entrance and internally at the reception area. The CCTV system records 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:** Recording equipment is located in the reception office of the school.
- (d) **Security:** Access to images/recordings is currently restricted to the principal and deputy, but in future may extend to secretarial and caretaking staff. Hard disk recordings are retained **for 28 days (this is yet to be verified with the company who has installed the system)** 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.

## **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 mock- 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 may be transferred to the Department of Education and Skills, the National Council for Curriculum and Assessment and such other similar bodies.
- (c) **Location:** In filing cabinets in secure, locked offices that only personnel who are authorised to use the data can access. Electronically, on the student management information system. Employees are required to maintain the confidentiality of any data to which they have access.
- (d) **Security:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

## **October Returns**

- (a) **Categories:** At the beginning of each academic year (and for 1st year or transferring students, on enrolment) parents/guardians and students are asked to provide the school with certain information so that the School can make returns to the Department of Education and Skills ("DES") referred to as "October Returns". These October Returns will include sensitive personal

data regarding personal circumstances which are provided by parents/guardians and students on the basis of explicit and informed consent. The October Return contains individualised data (such as an individual student's PPS number) which acts as an "identifier" for the DES to validate the data that belongs to a recognised student. The DES also transfers some of this data to other government departments and other State bodies to comply with legislation, such as transfers to the Department of Social Protection pursuant to the Social Welfare Acts, transfers to the State Examinations Commission, transfers to the Educational Research Centre, and transfers to the Central Statistics Office pursuant to the Statistics Acts. The data will also be used by the DES for statistical, policy-making and research purposes. However the DES advises that it does not use individual data, but rather aggregated data is grouped together for these purposes. The DES has a data protection policy which can be viewed on its website ([www.education.ie](http://www.education.ie)). The DES has also published a "Fair Processing Notice" to explain how the personal data of students contained in October Returns is processed. This can also be found on [www.education.ie](http://www.education.ie) (search for Circular Letter 0047/2010 in the "Circulars" section).

(b) **Purposes:** The school asks parents/guardians and students to complete October Returns for the purposes of complying with DES requirements to determine staffing and resource allocations and to facilitate the orderly running of the school. The main purpose of the October Returns is for the DES to determine whether the student qualifies for English language support and/or additional resources and support to meet their particular educational needs. The October Returns are submitted to the DES electronically. The DES has their own policy governing the security of the data sent to them by all post-primary schools. The co-operation of each student and/or their parents/guardians in completing the October Return is greatly appreciated as the school's aim is to ensure that each student is assisted in every way to ensure that s/he meets his/her full potential.

(c) **Location:** In filing cabinets in secure, locked offices 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:** These records are kept in manual records (personal file within a relevant filing system) and computer records (database, spreadsheet and text files). Offices are kept locked when unattended and computer stations require logon authentication to gain access to computerised files. Some files are further protected by a secure password.

### **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
- Admissions/Enrolment Policy
- CCTV Policy
- Substance Use Policy
- ICT Acceptable Usage Policy
- SPHE/CSPE etc.

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

Data in this school will be processed in line with the data subjects' rights. Data subjects have a right to:

- Request access to any data held about them by a data controller
- Prevent the processing of their data for direct-marketing purposes
- Ask to have inaccurate data amended
- Prevent processing that is likely to cause damage or distress to themselves or anyone else.

## **Dealing with a data access requests**

Requests for to access personal data are guided by the school's Data Access Procedures Policy (Appendix IV).

### **Section 3 access request**

Under Section 3 of the Data Protection Acts, an individual has 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. The individual must make this request in writing and the data controller will accede to the request within 21 days. The right under Section 3 must be distinguished from the much broader right contained in Section 4, where individuals are entitled to a copy of their data.

### **Section 4 access request**

Individuals are entitled to a copy of their personal data on written request. The individual is entitled to a copy of their personal data (subject to some exemptions and prohibitions set down in Section 5 of the Data Protection Act). A request must be responded to within 40 days and a fee may apply but cannot exceed €6.35 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 (no time limit but reasonable interval from the date of compliance with the last access 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 would the school refuse to furnish the data to the applicant.

A copy of the Data Access Request Form for both a Section 3 and Section 4 request is found in Appendix V.

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

In Edmund Rice College, 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.

### **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 and for 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              |
| Teaching personnel       | Awareness of responsibilities         |
| Administrative personnel | Security, confidentiality             |
| IT personnel             | Security, encryption, confidentiality |

### **Ratification & 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 all concerned are 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 the Enrolment Pack, by either enclosing it or incorporating it as an appendix to the enrolment form, or by specifically highlighting that the policy is available on the school website, whilst pointing out that a hard copy may be obtained from the school office.

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

The implementation of the policy shall be monitored by the principal.

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 at certain pre-determined times and as necessary. On-going review and evaluation should take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB), 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.

Ratified by the Board of Management of Edmund Rice College on \_\_\_\_\_ (Date)

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

This policy was adopted by the Board of Management on:

Signed:

Chairperson of Board of Management

Signed:

Principal

Date of next review: \_\_\_\_\_

# **Appendix I**

## **Records Management Procedures**

**This is an internal document for internal use only. This Appendix does not have to be circulated to students/parents.**

### **1. Purpose**

Good records management is of special significance in the context our school's functions, where the maintenance of academic records is a core activity. We aim to implement records management procedures and to ensure preservation of records of permanent value and to establish archival criteria to maintain and assure continued access to appropriate historical records.

### **2. Ownership of Records**

All records, irrespective of format, (i.e. both manual and automated data) created or received by Edmund Rice College staff in the course of their duties on behalf of Edmund Rice College, are the property of Edmund Rice College and subject to its overall control. Any employees leaving Edmund Rice College must leave all records intact for their successors and is not permitted to remove or retain records (in electronic or manual format) for any reason.

### **3. Management of Edmund Rice College Records**

3.1. All records created and received by Edmund Rice College staff in the course of their duties on behalf of Edmund Rice College must be retained for as long as they are required to meet the legal, administrative, financial and operational requirements of Edmund Rice College, after which time they are either destroyed or transferred to the school's archives.

3.2. The final disposition (either destruction or transfer to the archives) of records is carried out according to approved Records Retention Schedules as appended to the Edmund Rice College Data Protection Policy.

3.3. While the Records Retention Schedule (set out at Appendix 4 of the school Data Protection Policy) prescribes the minimum period that Edmund Rice College records must be retained, management may, at their discretion, keep the records for a longer period of time if it is deemed necessary and appropriate, and where it is required for a specific purpose (e.g. the defence of litigation).

3.4. A list of the vital records held within Edmund Rice College, shall be prepared and reviewed periodically. For example, Board/Committee meetings, Sub-committee meetings, Board of Management meetings, financial information, legal documentation etc. should be included in this.

## 4. Employee Duties

4.1. All Edmund Rice College employees are responsible for making and keeping the records of their work and shall:

4.1.1. Comply with the “Filing Guidelines” set out at Appendix 2 hereto.

4.1.2. Create records needed to do the business of Edmund Rice College, record decisions and actions taken, and generally document activities for which they are responsible and take care of records so that information can be found when needed. This means establishing or adhering to good directories and files, and filing materials (in any format) regularly and carefully in a manner that allows them to be safely stored and efficiently retrieved and returned when necessary.

4.1.3. Ensure that all records under their control are stored/retained/destroyed or archived in accordance with Edmund Rice College’s Records Retention Schedule (see Appendix 3 of the Edmund Rice Data Protection Policy).

## 5. Retention and Disposal

5.1. After the records have been retained for the requisite time in the Record Retention Schedule, they are either securely destroyed (e.g. by confidential cross-shredding by a third party contractor), or securely transferred to archival storage.

5.2. It is the responsibility of the principal to ensure that records are scheduled as necessary to be retained in the appropriate storage facility or securely disposed of.

## 6. Life-Cycle of Records within Edmund Rice College

6.1. Each record has a Life Cycle, which is as follows:

**Current Records** are those that are held on site in offices and are used on a very regular basis.

**Non-current Records** are records that are needed for occasional reference. Can be held on site in a dedicated storage area or stored off site with easy access.

**Disposition Records** are those which should either be archived or securely and confidentially cross-shredded.

6.2. Current Records:

6.2.1. Active Records: Active records are records that are required and referred to constantly for current use, and which need to be retained and maintained in office space and equipment close and readily accessible to users

6.2.2. Semi-active Records: Semi-active records are records that are referred to infrequently and are not required constantly for current use. Semi- active records are

removed from office space to storage until they are no longer needed.

### 6.3. Non-Current Records

6.3.1. Inactive Records: Inactive records are records which are no longer required to carry out the functions for which they were created. They should be stored until the retention period has lapsed.

6.3.2. Permanently Valuable Records – Archives: Permanently valuable records include those with legal, operational, administrative, historical, scientific, cultural and social significance.

# **Appendix II**

## **Filing Guidelines**

- a) Before filing a piece of paper, ask yourself, "Will I need this in the future?" Don't keep a piece of paper just on the chance that you may need it "someday."
- b) Don't always save every draft of a document. For most purposes the final version is sufficient.
- c) Don't file multiple copies of the same document, unless justified.
- d) The originator normally keeps copies of reports and correspondence. Just because a document is sent to you doesn't mean that you are obliged to keep it indefinitely. If you need to see it again, ask the originator for another copy.
- e) If, for example, records are scheduled for destruction after three years, don't store them for five years.
- f) In general, records received from schools/institutes/centres/offices should be filed under the name of the originating school/institute/centre/office.
- g) Some records may belong under more than one series or category. To handle this, file the records in one category and place a cross-reference note in the other. It is important to be consistent in deciding where to file records. Once information is filed in a given series and category, it should always be filed there.
- h) Label and date all files.
- i) Color-coding the different series is a useful tool, especially for refiling folders.
- j) Create a file guide with a description of the filing system and instructions for the user so new personnel can continue to use the filing system easily. This will also avoid the arbitrary creation of new file folders.
- k) Create cross-listings to help locate items. Create a file database on the PC using the file-folder heading, cross-listing, and location notes.
- l) Spell out acronyms and abbreviations.
- m) Sort records prior to filing.
- n) Use staples rather than paper clips in folders.
- o) Discard envelopes if the return address is available on the document itself. Most phone messages, illegible notes, and routine acknowledgements can also be discarded.
- p) Do not overfill file folders. If they are overfilled, divide them into several folders with the same name and File number (e.g.: Maternity Leave Applications 2008/2009, File 1).
- q) Do not overstuff file drawers. This can make retrieval of files difficult, as well as creating a dangerous work environment.

- r) Weed files regularly, using the approved Record Retention Schedule.
- s) Consider using "Out Markers" when removing folders for use. This makes refiling much easier and lets others in the office know that a file exists so another is not created, who has the file, and when it was checked out.

# Appendix III

## Records Retention Schedule

This schedule is available to view on <http://www.dataprotectionschools.ie/en/Resources/>

### Retention of Records

Schools as *data controllers* must be clear about the length of time for which personal data will be kept and the reasons why the information is being retained. In determining appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the data must be deleted or disposed of in a secure manner. It may also be anonymised to remove any personal data. Anonymisation must be irrevocable; removing names and addresses may not necessarily be sufficient.

In order to comply with this legal requirement, *Edmund Rice College, Carrigaline* has assigned specific responsibility and introduced procedures for ensuring that files are purged regularly and securely and that personal data is not retained any longer than is necessary. All records will be periodically reviewed in light of experience and any legal or other relevant indications.

**IMPORTANT:** In all cases, schools should be aware that where proceedings have been initiated, are in progress, or are reasonably foreseeable (although have not yet been taken against the school/board of management/an officer or employee of the school (which may include a volunteer)), all records relating to the individuals and incidents concerned should be preserved and should under no circumstances be deleted, destroyed or purged. The records may be of great assistance to the school in defending claims made in later years.

**WARNING:** In general, the limitation period does not begin to run until the person concerned acquires knowledge of the facts giving rise to the claim and the Statute of Limitations may be different in every case. In all cases where reference is made to “18 years” being the date upon which the relevant period set out in the Statute of Limitations commences for the purposes of litigation, the school must be aware that in some situations (such as the case of a student with special educational needs, or where the claim relates to child sexual abuse, or where the student has not become aware of the damage which they have suffered, and in some other circumstances), the Statute of Limitations **may not begin to run when the student reaches 18 years of age and specific legal advice should be sought by schools on a case-by-case basis.** In all cases where retention periods have been recommended with reference to the relevant statutory period in which an individual can make a claim, these time-frames may not apply where there has been misrepresentation, deception or fraud on the part of the respondent/defendant. In such a circumstance, the school/SCHOOL should be aware that the claim could arise many years after the incident complained of and the courts/tribunals/employment fora may not consider the complainant to be “out of time” to make their claim.

# **Appendix IV**

## **Edmund Rice College**

### **Data Access Procedures Policy**

The Data Protection Acts, 1988 and 2003 provide for a right of access by an individual data subject to personal information held by Edmund Rice College. The following procedure is provided to ensure compliance with the Edmund Rice College's obligations under the Acts and governs the manner in which requests for access to personal data will be managed by Edmund Rice College. A data subject is required to familiarize themselves with the procedure and to complete the Data Access Request Form (see Appendix Data Protection Policy) which will assist the school in processing the access request where personal information (or in the case of a parent/guardian making an access request on behalf of a student, personal information in relation to their child) as a data subject is processed and retained by Edmund Rice College. It is important to note that only personal information relating to the individual (or in the case of a parent/guardian making an access request on behalf of a student, only personal information in relation to his/her/their child) will be supplied. No information will be supplied that relates to another individual.

#### **Important note to students making access requests**

Where a student (aged under 18 years) makes an access request, the school may inform the student that:

- (a) Where they make an access request, their parents will be informed that they have done so and
- (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.

This is provided for in the school's Data Protection Policy. The right of access under the Data Protection Acts is the right of the data subject. However, there may be some data held by the school which may be of a sensitive nature and the school will have regard to the following guidance issued by the Office of the Data Protection Commissioner in relation to releasing such data:

- a) 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.
- b) 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.
- c) 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, i.e. it is suggested that:

- If the information is ordinary, routine or non-controversial (e.g. 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 before releasing the data to the student
- 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. d) In the case of students under the age of twelve, an access request may be made by their parent or guardian on the student's behalf. However, the school must note that the right of access is a right of the data subject themselves (i.e. it is the right of the student). Therefore, access documentation should be addressed to the child at his/her address which is registered with the school as being his/her home address. It should not be addressed or sent to the parent who made the request. For further information, see "Important Note to Parents Making Access Requests on Behalf of their Child" below.

### ***Important note to parents making access requests on behalf of their child***

Where a parent/guardian makes an access request on behalf of their child (a student aged under 18 years), the right of access is a right of the data subject (i.e. it is the student's right). In such a case, the access materials will be sent to the child, not to the parent who requested them. This means that the access request documentation will be sent to the address at which the child is registered on the school's records and will be addressed to the child. The documentation will not be sent to or addressed to the parent/guardian who made the request. Where a parent/guardian is unhappy with this arrangement, the parent/guardian is invited to make an application to court under section 11 of the Guardianship of Infants Act 1964. This provision 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/guardian, a copy of the order should be given to the school by the parent/guardian and the school can release the data on foot of the court order.

### **Individuals making an access request**

On making an access request, any individual (subject to the restrictions in Notes A and B below) about whom a school keeps personal data, is entitled to:

- A copy of the data which is kept about him/her (unless one of the exemptions or prohibitions under the Data Protection Acts apply, in which case the individual will be notified of this and informed of their right to make a complaint to the Data Protection Commissioner)
- Know the purpose/s for processing his/her data

- Know the identity (or the categories) of those to whom the data is disclosed
- Know the source of the data, unless it is contrary to public interest.

### **Data access requirements**

To make an access request, you as a data subject must: Apply in writing requesting access to your data under section 4 Data Protection Acts or, alternatively, request an Access Request Form (see Appendix V of the Data Protection Policy) which will greatly assist the school in processing your access request more quickly.

The school reserves the right to request official proof of identity (e.g. photographic identification such as a passport or driver's licence) where there is any doubt on the issue of identification.

On receipt of the access request form, a co-ordinator will be appointed to check the validity of your access request and to check that sufficient information to locate the data requested has been supplied (particularly if CCTV footage/images are to be searched).

Where a request is made under Section 3 of the Data Protection Acts, the following information will be supplied:

- (i) what the school holds by way of personal information about you ((or in the case of a request under section 3 made by a parent/guardian of a student aged under 18 years, then the personal information held about that student) and
- (ii) a description of the data together with details of the purposes for which his/her data is being kept will be provided. Actual copies of your personal files (or the personal files relating to the student) will not be supplied. No personal data can be supplied relating to another individual. A response to your request will be provided within 21 days of receipt of the access request form and no fee will apply.

Where a request is made under Section 4 of the Data Protection Acts, the following information will be supplied within 40 days and an administration fee of €6.35 will apply. The individual is entitled to a copy of all personal data, i.e.

- A copy of the data which is kept about him/her (unless one of the exemptions or prohibitions under the Data Protection Acts applies, in which case the individual will be notified of this and informed of their right to make a complaint to the Data Protection Commissioner)
- Be advised of the purpose/s for processing his/her data
- Be advised of the identity (or the categories) of those to whom the data is disclosed
- Be advised of the source of the data, unless it is contrary to public interest.

Where a request is made with respect to examination results an increased time limit of 60 days from the date of the first publication of the results or from the date of the access request, whichever is the later will apply.

Before supplying the information requested to you as data subject (or where the access request is made on behalf of a student aged under 18 years, information relating to the student), the school will check each item of data to establish:

- If any of the exemptions or restrictions set out under the Data Protection Acts apply, which would result in that item of data not being released, or
- Where the data is “health data”, whether the obligation to consult with the data subject’s medical practitioner applies, or
- Where the data is “social work data”, whether the prohibition on release applies.

If data relating to a third party is involved, it will not be disclosed without the consent of that third party or alternatively the data will be anonymised in order to conceal the identity of the third party. Where it is not possible to anonymise the data to ensure that the third party is not identified, then that item of data may not be released.

Where the school may be unsure as to what information to disclose, the school reserves the right to seek legal advice.

The school will ensure that the information is provided in an intelligible form (e.g. codes explained) or will provide an explanation. The school reserves the right to supply personal information to an individual in an electronic format e.g. on tape, USB, CD etc.

Where a subsequent or similar access request is made after the first request has been complied with, the school has discretion as to what constitutes a reasonable interval between access requests and this will be assessed on a case-by case basis.

Where you as an individual data subject may seek to rectify incorrect information maintained by the school, please notify the school and a form will be supplied to you for this purpose. You should however note that the right to rectify or delete personal data is not absolute. You have the right to make a complaint to the Data Protection Commissioner about a refusal. Where the school declines to rectify or delete the personal data as you have instructed, the school may propose to supplement your personal record, pursuant to section 6(1)(b) Data Protection Acts.

In circumstances where your access request is refused, Edmund Rice College will write to you explaining the reasons for the refusal and the administration fee, if provided, will be returned. In such circumstances, you have the right to make a complaint to the Office of the Data Protection Commissioner [www.dataprotection.ie](http://www.dataprotection.ie). Similarly, the administration access fee will be refunded

to you if the school has to rectify, supplement or erase your personal data.

Where requests are made for CCTV footage, an application must be made in writing and the timeframe for response is within 40 days. All necessary information such as the date, time and location of the recording should be given to the school to assist the school in dealing with your request. Where the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data. In providing a copy of personal data, the school may provide the materials in the form of a still/series of still pictures, a tape, disk, USB, with relevant images. Other people's images will be obscured before the data is released. If other people's images cannot be obscured, then the images/recordings may not be released.

**There are a number of exceptions to the general rule of right of access, including those specified in Notes A and B in Appendix A which is part of this Appendix. This procedure is regularly reviewed in line with the school's commitment to its responsibilities under data protection.**

## **Appendix A to the Data Access Procedures Policy**

### **Note A: Access requests by students**

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, i.e. it is suggested that
- If the information is ordinary, routine or non-controversial (e.g. 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.
- In the case of students under the age of twelve, an access request may be made by their parent or guardian on the student's behalf. The consent of the child need not be obtained. However, the school must note that the right of access is a right of the data subject themselves (i.e. it is the right of the student). Therefore, access documentation should be

addressed to the child at his/her address which is registered with the school as being his/her home address. It should not be addressed or sent to the parent who made the request. For further information, see “Important Note to Parents Making Access Requests on Behalf of their Child” below.

- In any of the circumstances outlined above, if the data contains health data and disclosure would be likely to cause serious harm to the physical or mental health of the individual concerned, the school is obliged to withhold the data until they have consulted with the data subject’s medical practitioner and (in the case of a student under 18 or a student with special educational needs whose disability or medical condition would impair his or her ability to understand the information), parental/guardian consent should also be sought.
- In some cases (i.e. where the information is “health data”), it is advised that the data be supplied by the medical practitioner.
- In any of the circumstances outlined above, if the data contains social work data and disclosure would be likely to cause serious harm to the physical or mental health of the individual, the school is not permitted to release the data to the individual.

***Important note to parents making access requests on behalf of their child***

Where a parent/guardian makes an access request on behalf of their child (a student aged under 18 years), the right of access is a right of the data subject (i.e. it is the student’s right). In such a case, the access materials will be sent to the child, not to the parent who requested them. This means that the access request documentation will be sent to the address at which the child is registered on the school’s records and will be addressed to the child. The documentation will not be sent to or addressed to the parent/guardian who made the request. Where a parent/guardian is unhappy with this arrangement, the parent/guardian is invited to make an application to court under section 11 of the Guardianship of Infants Act 1964. This provision 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/guardian, a copy of the order should be given to the school by the parent/guardian and 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 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:
  - 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.
  - 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.
  - 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/legal advisors in relation to a case against the school should not be disclosed to the claimant pursuant to a data access request.
  - 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 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.

- 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.
- 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.

Where a 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 must 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. For further information, see *What if a school refuses an access request?* (<http://www.dataprotectionschools.ie/en/Data-Protection-Guidelines/Data-Access-Requests/What-if-a-school-ETB-refuses-an-access-request/>)

# Appendix V

## Edmund Rice College

### Data Access Request Form

***Date:***

Access Request Form: Request for a copy of Personal Data under the Data Protection Act 1988 and Data Protection (Amendment) Act 2003

**Important: Proof of Identity must accompany this Access Request Form (eg. official/State photographic identity document such as driver’s licence, passport).**

**A fee of €6.35 must accompany this Access Request Form if it is a Section 4 Data Access Request together with proof of identity (eg. official/State photographic identity document such as driver’s licence, passport).**

Full Name: \_\_\_\_\_

Maiden Name (if name used during your school duration): \_\_\_\_\_

Address: \_\_\_\_\_

Contact number \* : \_\_\_\_\_

Email addresses \*: \_\_\_\_\_

*\* We may need to contact you to discuss your access request*

**Please tick the box which applies to you:**

|                                  |  |   |  |                                       |
|----------------------------------|--|---|--|---------------------------------------|
| Student <input type="checkbox"/> | Parent/Guardian <input type="checkbox"/> | Former student <input type="checkbox"/> | Current staff <input type="checkbox"/> | Former staff <input type="checkbox"/> |
|----------------------------------|--|---|--|---------------------------------------|

**Section 3 Data Access Request:**

I, .....[insert name] wish to be informed whether or not Edmund Rice College, Carrigaline holds personal data about me/my child and to be provided with a description of this data and to be informed of the purpose for holding such data. I am making this access request under Section 3 of the Data Protection Acts.

**OR**

**Section 4 Data Access Request:**

I, ..... [insert name] wish to make an access request for a copy of any personal data that Edmund Rice College, Carrigaline holds about me/my child. I am making this access request under Section 4 of the Data Protection Acts.

**Section 4 Data Access Request only: I enclose €6.35**

Any other information relevant to your access request (e.g. if requesting images/recordings made by CCTV, please state the date, time and location of the images/recordings (otherwise it may be very difficult or impossible for the school to locate the data).

Signed ..... Date .....

**Checklist: Have you:**

- 1) Completed the Access Request Form in full?
- 2) Included a cheque or postal order made payable to Edmund Rice College in the amount of €6.35 where a Section 4 request is made? (Please do not send us €6.35 if you are making a request under section 3. There is no administration charge for a section 3 request, and if you send us a cheque, it will be returned to you).
- 3) Signed and dated the Access Request Form?
- 4) Included a photocopy of official/State photographic identity document (driver's licence, passport etc.)\*.

\*The school should satisfy itself as to the identity of the individual, and make a note in its records that identity has been provided, but the school should not retain a copy of the identity document.

**Please return this form to: The Principal, Edmund Rice College, Carrigaline, Co Cork.**

