



# Polasaí maidir le Cosaint Sonraí agus Taifid a Choinneáil

## INTRODUCTORY STATEMENT

The Coláiste's Data Protection Policy applies to the *personal data* held by the Coláiste's Coiste Bainistíochta, which is protected by the Data Protection Acts 1988 to 2018 and the EU General Data Personal Regulation (GDPR)

The policy applies to all Coláiste staff, the Coiste Bainistíochta, Parents/Guardians, Students and others (including prospective or potential students and their parents/guardians and applicants for staff positions within the Coláiste) 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 special categories of personal data will be protected by the Coláiste.

Coláiste na Rinne operates a "*Privacy by Design*" method in relation to Data Protection. This means we plan carefully when gathering personal data so that we build in the *data protection principles* as integral elements of all data operations in advance. We audit the personal data we hold in order to

1. be able to provide access to individuals to their data
2. ensure it is held securely
3. document our data protection procedures
4. enhance accountability and transparency

## DATA PROTECTION PRINCIPLES

The Coiste Bainistíochta is a *data controller* of *personal data* relating to its past, present and future staff, students, parents/guardians and other members of the Coláiste community. As such, the Coiste is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988 to 2018 and GDPR, which can be summarised as follows:

### 1. Obtain and process Personal Data fairly

Information on students is gathered with the help of parents/guardians and staff. In relation to information the Coláiste holds on other individuals (members of staff, individuals applying for positions within the Coláiste, 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 Coláiste. All such data is treated in accordance with the Data Protection legislation and the terms of this Data Protection Policy. The information will be obtained and processed fairly

### 2. Consent

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 Consent can be withdrawn by data subjects in these situations





**3. Keep it only for one or more specified and explicit lawful purposes**

The Coiste Bainistíochta will inform individuals of the reasons they collect their data and 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

**4. 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

**5. Keep Personal Data safe and secure**

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

**6. Keep Personal Data accurate, complete and up-to-date**

Students, parents/guardians, and/or staff should inform the Coláiste of any change which the Coláiste should make to their personal data and/or sensitive personal data to ensure that the individual's data is accurate, complete and up-to-date. Once informed, the Coláiste will make all necessary changes to the relevant records. Records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation should be dated and signed by the person making that change

**7. 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

**8. 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 Coláiste. Thereafter, the Coláiste will comply with DES guidelines on the storage of Personal Data relating to a student. In the case of members of staff, the Coláiste will comply with both DES guidelines and the requirements of the Revenue Commissioners with regard to the retention of records relating to employees. The Coláiste 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.

**9. Provide a copy of their personal data to any individual on request**

Individuals have a right to know and have access to a copy of personal data held about them, by whom, and the purpose for which it is held

**SCOPE**

The Data Protection legislation applies to the keeping and processing of *Personal Data*. The purpose of this policy is to assist the Coláiste to meet its statutory obligations, to explain those obligations to Coláiste staff, and to inform staff, students and their parents/guardians how their data will be treated



The policy applies to all Coláiste staff, the Coiste Bainistíochta, parents/guardians, students and others (including prospective or potential students and their parents/guardians, and applicants for staff positions within the Coláiste) insofar as the Coláiste handles or processes their *Personal Data* in the course of their dealings with the Coláiste.

### **Definition of Data Protection Terms**

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

*Personal Data* means any data relating to an identified or identifiable natural person i.e. 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.

*Data Controller* is the Coiste Bainistíochta of the Coláiste

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

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

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

*Data Processor* - a person who processes personal information on behalf of a data controller, but **does not include an employee of a data controller** who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection legislation places responsibilities on such entities in relation to their processing of the data.

*Special categories of Personal Data* refers to *Personal Data* regarding a person's

- racial or ethnic origin
- political opinions or religious or philosophical beliefs
- physical or mental health
- sexual life and sexual orientation
- genetic and biometric data
- criminal convictions or the alleged commission of an offence
- trade union membership

*Personal Data Breach* – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. This means any compromise or loss of personal data, no matter how or where it occurs





## **RATIONALE**

In addition to its legal obligations under the broad remit of educational legislation, the Coláiste has a legal responsibility to comply with the Data Protection Acts 1988 to 2018 and 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. The Coláiste 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 Director and Coiste Bainistíochta to make decisions in respect of the efficient running of the Coláiste. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the Coláiste and Coiste Bainistíochta.

## **OTHER LEGAL OBLIGATIONS**

Implementation of this policy takes into account the Coláiste'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 Coláiste relating to the progress of the student in their education

Under **Section 20 of the Education (Welfare) Act, 2000**, the Coláiste must maintain a register of all students attending the Coláiste

Under **Section 28 of the Education (Welfare) Act, 2000**, the Coláiste may supply *Personal Data* kept by it to certain prescribed bodies (the Department of Education and Skills, Tusla, the National Council for Special Education and other schools). The Coiste Bainistíochta must be 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; 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 Coláiste is required to furnish to the National Council for Special Education (and its employees, which would include Special Educational Needs Organisers) 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 most schools are not currently subject to freedom of information legislation, (with the exception of schools under the direction of Education and Training Boards), 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 by that body 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 Act 2015*, mandated persons in schools have responsibilities to report child welfare concerns to TUSLA- Child and Family Agency (or in the event of an emergency and the unavailability of TUSLA, to An Garda Síochána)

## PERSONAL DATA

The *Personal Data* records held by the Coláiste **may** include:

### 1. *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 Coláiste, trainee teachers and teachers under probation. These staff records may include:

- Name, address and contact details, PPS number.
- Name and contact details of next-of-kin in case of emergency.
- 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 Coláiste property or in connection with the staff member carrying out their Coláiste duties
- Records of any reports the Coláiste (or its employees) have made in respect of the staff member to State departments and/or other agencies under Children First Act 2015

#### b) *Purposes:*

Staff records are kept for the purposes of:

- the management and administration of Coláiste 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 Coláiste 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 Coláiste 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 Coláiste.

#### c) *Location and Security procedures of Coláiste na Rinne*

- a. Manual records are kept in a secure, locked filing cabinet in a locked administration office only accessible to personnel who are authorised to use the data. Employees are required to maintain the confidentiality of any data to which they have access.



- b. Digital records are stored on password-protected computer with adequate encryption and firewall software in a locked office. The Coláiste has the burglar alarm activated during out-of-work hours.

## 2. 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 Coláiste. 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 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 facility(ies) attended by the student)
- Psychological, psychiatric and/or medical assessments
- Attendance records
- Photographs and recorded images of students (including at Coláiste events and noting achievements) are managed in line with the accompanying policy on Coláiste photography.
- Academic record – subjects studied, class assignments, examination results as recorded on official Coláiste reports
- Records of significant achievements
- Whether the student is exempt from studying Irish
- Records of disciplinary issues/investigations and/or sanctions imposed
- 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 Coláiste (or its employees) have made in respect of the student to State Departments and/or other agencies under Children First Act 2015.

### b) *Purposes: The purposes for keeping student records include:*

- to enable each student to develop to his/her full potential
- to comply with legislative or administrative requirements
- to ensure that eligible students can benefit from the relevant additional teaching or financial supports
- to support the provision of religious instruction





- to enable parents/guardians to be contacted in the case of emergency or in the case of Coláiste closure, or to inform parents of their child's progress or to inform parents of Coláiste events, etc.
- to meet the educational, social, physical and emotional requirements of the student
- photographs and recorded images of students are taken to celebrate Coláiste achievements, e.g. compile yearbooks, establish a Coláiste website, record Coláiste events, and to keep a record of the history of the Coláiste. Such records are taken and used in accordance with the 'Coláiste Photography Policy' and 'Coláiste Website Privacy Statement'.
- to ensure that the student meets the Coláiste's admission criteria
- 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 second-level educational institutions.

c) *(Location and Security procedures as above):*

### 3. **Coiste Bainistíochta records:**

#### a) *Categories of Coiste Bainistíochta data:*

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

#### b) *Purposes:*

To enable the Coiste Bainistíochta to operate in accordance with the Education Act 1998 and other applicable legislation and to maintain a record of Coiste appointments and decisions.

c) *(Location and Security procedures as above):*

### 4. **Other Records: Creditors**

#### a) *Categories of Coiste Bainistíochta data:*

The Coláiste 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: The purposes for keeping creditor records are:*

This information is required for routine management and administration of the Coláiste'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 and Security procedures as above):*

**5. Other Records: Charity Tax-back Forms**

*a) Categories of Coiste Bainistíochta data:*

The Coláiste may hold the following data in relation to donors who have made charitable donations to the Coláiste:

- name
- address
- telephone number
- PPS number
- tax rate
- signature and
- the gross amount of the donation.

*b) (Location and Security procedures as above):*

**CCTV IMAGES/RECORDINGS-**

CCTV is installed in Coláiste na Rinne.

These CCTV systems may record images of staff, students and members of the public who visit the premises.

The viewing station is in the main office.

**Purposes:**

Safety and security of staff, students and visitors and to safeguard Coláiste property and equipment.

**Security:**

Access to images/recordings is restricted to the Director and authorised personnel.

Recordings are retained for 31 days, except if required for the investigation of an incident.

Images/recordings may be viewed or made available to An Garda Síochána pursuant to Data Protection Acts legislation.





## LINKS TO OTHER POLICIES

Our Coláiste policies need to be consistent with one another, within the framework of the overall Coláiste Plan. Relevant Coláiste 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 Procedures
- Anti-Bullying Procedures
- Code of Behaviour
- Admissions Policy
- Critical Incident Policy

## PROCESSING IN LINE WITH A DATA SUBJECT'S RIGHTS

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

- Know what personal data the Coláiste is keeping on them
- 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
- Ask to have data erased once it is no longer necessary or irrelevant.

### Personal Data Breaches

All incidents in which personal data has been put at risk must be reported to the Office of the Data Protection Commissioner within 72 hours

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Coiste Bainistíochta must communicate the personal data breach to the data subject without undue delay

If a data processor becomes aware of a personal data breach, it must bring this to the attention of the data controller without undue delay.

### Dealing with a data 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

Request must be responded to within one month. An extension may be required e.g. over holiday periods

No fee may be charged except in exceptional circumstances where the requests are repetitive or manifestly unfounded or excessive

No personal data can be supplied relating to another individual apart from the data subject

## PROVIDING INFORMATION OVER THE PHONE



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

- Ask that the caller put their request in writing
- Refer the request to the Director for assistance in difficult situations
- Not feel forced into disclosing personal information

### **IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES**

The Coiste Bainistíochta is the data controller and the Director implements the Data Protection Policy, 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>    |
|-----------------------|--------------------------|
| Coiste Bainistíochta: | Data Controller          |
| Stiúrthóir:           | Implementation of Policy |

### **MONITORING THE IMPLEMENTATION OF THE POLICY**

The implementation of the policy shall be monitored by the Director, staff and the Coiste Bainistíochta.





## Records Management and Retention Policy

### Records Management

Records Management is the application of controls and procedures to the creation, maintenance, use and disposal of records in accordance with approved procedures. Records Management includes: management of filing systems, retention scheduling, the administration of inactive records storage, management of record conversion programmes, disaster planning, vital records protection, archival preservation activities and appropriate destruction of records.

### Ownership of Records

All records including emails, images, photographs, databases etc. that are created by Coláiste na Rinne employees in the course of their duties are the property of Coláiste na Rinne.

### Responsibilities of Coláiste na Rinne Employees

This policy applies to all areas and locations of the Coláiste and includes all departments. The confidentiality of information within records must be safeguarded at all times. It is the responsibility of each employee to ensure that appropriate security measures are observed for maintaining records containing personal or other confidential information.

When scheduled for destruction, records must be shredded, pulped or otherwise disposed of securely. The manner of destruction of records must be appropriate to the level of confidentiality of the records. In the case of in-house destruction, the department should document and retain the date and manner of destruction of records.

### Definition of a record

Records are documents in all formats, which are created/received and maintained as evidence of business completed or as a source of knowledge and which must be retained for as long as required to meet legal, administrative, financial, operational or historic needs of the Coláiste.

The freedom of Information Act 2014 defines a “record” as:

- a) A book or other written or printed material in any form including electronic device or in machine readable form.*
- b) A map, plan or drawing.*
- c) A disc, tape or other mechanical or electronic device in which data other than visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the disc, tape or other device.*
- d) A film, disc, tape or other mechanical or electronic device in which visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the film, disc, tape or other device.*
- e) A copy or part of anything which falls within paragraph (a), (b), (c) or (d).*

### Forms of Records

Records may exist in a variety of physical forms including:

- Paper documents (written or printed matter).
- Electronic records (word processing files, databases, spreadsheet files, emails, CCTV footage, electronic data on any media).
- Books, drawings and photographs.



- Anything on which information is recorded or stored by graphic, electronic or mechanical means.
- Copies of original records.

### Electronic Records

- The nature of electronic records requires that consideration be given to security, authenticity, accessibility, version control, preservation (e.g. back-up of records) and the disposal of such records.
- Employees must apply the following good housekeeping practices in the management of electronic records:
  - Sensible and consistent naming of files and folders.
  - Systematic indexing / classification of records.
  - Backup of appropriate files on a regular basis.
  - Delete records regularly, including email records.
  - Restrict access to record systems (use of passwords, timed lock out of PCs etc..).
  - Particularly sensitive records to be emailed to external bodies should be password protected.
  - Produce paper copies if required to maintain the integrity of manual files etc.

### Management and Retention of Records

Records will be retained in line with the 'Information from the Data Protection Commissioners Records Retention Schedule' for as long as they are required to meet the legal, administrative, financial and operational requirements of the Coláiste during which time, they should be filed appropriately. Following a period of time, they are either archived or destroyed.

Síniú:   
(Cathaoirleach)

Dáta: 27/5/23

Síniú:   
(Stiúrthóir)

Dáta: 27/5/23





## **Records Retention Schedule**

| <b>Records relating to pupils/students</b>                            | <b>Final Disposition</b>   | <b>Retention Comments</b>  |
|---|--|--|
| Enrolment Forms (for pupils admitted to the Coláiste)                 | Confidential<br>Shredding/deletion                                     | Student reaching 18 years + 7 years. 18 is age of majority + 7 years (6 years in which to take a claim against the Coláiste, + 1 year for proceedings to be served).   |
| Disciplinary Notes  | As above   | As above   |
| Tours/Trips records – Including: permission slips, itinerary reports. | As above   | As above   |
| Section 29 appeal records (Appeals against suspension or expulsion).  | As above   | As above   |
| Accident Reports  | As above   | As above   |
| Record of complaints made by parents/guardians.                       | Confidential shredding or N/A, depending on the nature of the records. | Depends entirely on the nature of the complaint but no longer than is necessary for the purpose of recording. If complaint is of a more mundane nature (e.g. misspelling of child's name, parent not contacted to be informed etc) retention as above. |
| Enrolment form where child not enrolled / refused enrolment.          | Confidential shredding / deletion                                      | 2 years after non-admission, to provide time for review/appeal process.  |
| Psychological assessments.  | N/A  | Never destroy.   |
| SEN files, reviews, correspondence & IEPs.                            | N/A  | Never destroy.   |
| Child Protection Records.   | N/A  | Never destroy.   |

| <b>Staff personnel files (whilst in employment)</b>  | <b>Final Disposition</b>  | <b>Retention Comments</b>   |
|--|---|---|
| Applications, qualifications, references, job specification, contract, Teaching Council registration, staff training records, Garda vetting etc. | Confidential<br>Shredding. Retain an anonymised sample for archival purposes. | Retain for duration of employment plus 7 years (6 years in which to take a claim against the Coláiste, plus 1 year for proceedings to be served). |
| Application & / C.V.   | Confidential shredding/deletion   | As above  |
| Qualifications   | As above  | As above  |
| References   | As above  | As above  |
| Interview: database of applications (section which relates to employees only).   | As above  | As above  |



|  |          |  |
|--|----------|--|
| Selection Criteria.                                    | As above | As above   |
| Interview board marking scheme and board notes.        | As above | As above   |
| Interview board panel recommendation.                  | As above | As above   |
| Recruitment medical.                                   | As above | As above   |
| Garda vetting outcome.                                 | As above | Record of outcome retained for 3 years.  |
| Job specification / description.                       | As above | As above   |
| Contract / Conditions of employment.                   | As above | As above   |
| Probation letters / forms.                             | As above | As above   |
| Leave of Absence applications.                         | As above | As above   |
| Allegations / Complaints.                              | As above | As above: <b>Please note</b> – relevant policy re: Disciplinary Procedures in relation to the period of time for which a warning remains ‘active’ on an employee’s record. |
| Grievance and Disciplinary records.                    | As above | As above: <b>Please note</b> – relevant policy re: Disciplinary Procedures in relation to the period of time for which a warning remains ‘active’ on an employee’s record. |
| Job Share.   | As above | As above   |
| Carer Break.   | As above | As above   |
| Maternity Leave.                                       | As above | As above   |
| Paternity Leave.                                       | As above | As above   |
| Parental Leave.  | As above | Retain for a minimum of 8 years.   |
| Parent’s Leave.  | As above | Retain for a minimum of 8 years.   |
| Force Majeure Leave.                                   | As above | Retain for a minimum of 8 years.   |
| Carers Leave.  | As above | Retain for a minimum of 8 years.   |
| Working Time Act (attendance hours, holidays, breaks). | As above | Retain for a minimum of 3 years.   |

| Recruitment Process – Unsuccessful Candidate Records                 | Final Disposition                 | Retention Comments   |
|--|-----------------------------------|--|
| Note: these retention periods apply to unsuccessful candidates only. | Confidential Shredding / deletion | 18 months from close of competition. 12 months plus 6 months for Workplace Relations Commission to inform company that a claim is being taken. |
| Candidate applications / CVs called for interview.                   | As above                          | As above   |
| Database of applications.  | As above                          | As above   |
| Selection Criteria.  | As above                          | As above   |





|  |          |          |
|--|----------|----------|
| Applications of candidates not shortlisted.            | As above | As above |
| Unsolicited job applications.                          | As above | As above |
| Candidates short listed but unsuccessful at interview. | As above | As above |
| Successful candidates who did not accept offer.        | As above | As above |
| Interview board marking scheme & board notes.          | As above | As above |
| Panel recommendation by interview board.               | As above | As above |

| Occupational Health Records                          | Final Disposition                        | Retention Comments   |
|--|--|--|
| Sickness absence records / certificates.             | Confidential shredding or do not destroy | Retain for 7 years (6 years in which to take a claim against the Coláiste, plus 1 year for proceedings to be served), unless sickness absence relates to an accident/injury/incident sustained in relation to/in connection with individuals employment duties, in which case, do not destroy. |
| Pre-employment medical assessment.                   | As above                                 | As above   |
| Occupational Health referral.                        | As above                                 | As above   |
| Correspondence re: retirement on ill-health grounds. | As above                                 | As above   |
| Medical assess/referrals                             | As above                                 | As above   |
| Sick leave records (sickness benefit forms).         | As above                                 | In the case of an audit/refunds as above.  |
| Accident / Injury reports.                           | As above                                 | Retain for 10 years or as above.   |

| Government Returns   | Final Disposition                              | Retention Comments   |
|--|--|--|
| Any returns which identify individual members of the Coláiste. | Confidential shredding / retained indefinitely | Depends on return. If it relates to pay/pension/benefits of staff, keep indefinitely. If it relates to student information, e.g. Annual Census etc., 'Student Records' guidelines apply. |

| Superannuation / Pension / Retirement Records | Final Disposition | Retention Comments |
|---|-------------------|--------------------|
|---|-------------------|--------------------|



|                       |                                   |  |
|-----------------------|-----------------------------------|--|
| Pension calculations. | Confidential shredding / deletion | Duration of employment + 7 years (6 years in which to take a claim + 1 year for proceedings to be served). |
| Pension increases.    | As above                          | As above   |
| Salary claim forms.   | As above                          | As above   |

| Coiste Bainistíochta Records | Final Disposition | Retention Comments |
|------------------------------|-------------------|--------------------|
| Board agenda and minutes.    | N/A               | Indefinitely.      |

| Other Coláiste based reports / minutes | Final Disposition      | Retention Comments  |
|--|------------------------|---|
| CCTV recordings.                       | Safe/Secure deletion   | 28 days in the normal course, but longer on a case-by-case basis e.g. where recordings/images are requested by An Garda Síochána as part of an investigation or where the records / images capture issues such as damage/vandalism to Coláiste property & where images/recordings are retained to investigate those issues. |
| Payroll and taxation                   | Confidential shredding | Revenue Commissioners require records to be kept for at least 6 years after the end of the tax year. Records must be made available for inspection by authorised Revenue Commissioner officers or of Dept. of Social Protection.  |
| Audited Accounts                       | As above               | Retain for a period of 7 years.   |
| Invoices/ back up records/ receipts.   | As above               | Retain for a period of 7 years.   |

| Service Records                   | Final Disposition            | Retention Comments  |
|-----------------------------------|------------------------------|---|
| Service Diaries                   | Confidential shredding       | Retain for 3 years.                                       |
| Maintenance Diaries               | Confidential shredding       | Retain for 3 years.                                       |
| Internal Quality Control records  | Confidential shredding       | Retain for 3 years.                                       |
| Fire Drill records                | Confidential shredding       | Retain for 2 years.                                       |
| Fire equipment certificate copies | Confidential shredding       | Retain for 6 years from date equipment is decommissioned. |
| Fire Registers.                   | Retain original indefinitely | Indefinitely  |





|                                       |                        |                      |
|---------------------------------------|------------------------|----------------------|
| Bank Statements                       | Confidential shredding | Retain for 10 years. |
| Purchase Ledger – Invoices            | Confidential shredding | Retain for 6 years.  |
| Payment Authorisation books           | Confidential shredding | Retain for 6 years.  |
| Petty Cash                            | Confidential shredding | Retain for 2 years.  |
| Receipt Books                         | Confidential shredding | Retain for 6 years.  |
| Deeds and Titles of properties/assets | N/A                    | Indefinitely         |
| Building Plans                        | N/A                    | Indefinitely         |

