

PERSONAL DATA AUDIT

The purpose of a Data Audit is to ascertain exactly

- what personal data the BoM as Data Controller has
- the legal basis for processing that data
- where it stores it
- how long it is retained
- who it shares the data with

Once completed, the Data Controller will be in a position

- to provide information in relation Data Access Requests
- produce a Document Audit Trail – understand how information flows through the school system i.e.
 - how it is collected, where it is used – offices, classrooms, etc.
 - what forms it is in – electronic, paper
 - copies – are there multiple copies of the data and are they all accounted for
 - who has access to it
 - where it ends up – stored for a medium or long term or safely disposed of
 - how data is safely disposed of – shredded, incinerated, etc.
- to assess the extent and degree of risk of any Data Breach which might occur
- to assess how safe the data is in its current storage location and to improve this if required assess where there are weaknesses in the school's Data Protection procedures and remedy them by updating policies, protocols or procedures as required

Types of Data Held by BoM

Data on Pupils

Data on Parents

Data on Staff – Teachers, SNAs, Ancillary Staff

Data on Volunteers

Data on Tradespeople – Electricians, Plumbers etc.

Data on Educational Supply Companies – Company Representatives

Data on Professional Service Providers – Accountants, Lawyers etc.

Data on Third Party Processors – School Administration software, School Accounting etc.

Data on Local Emergency Services – Gardaí, Medical, Fire Brigade etc.

To assist in the compilation of the Data Audit, the BoM might consider the following Data Mapping activities:

- devise a questionnaire for all Teachers, SNAs and Ancillary Staff in relation to their
 - Use of pupil personal data
 - Possession of pupil personal data
 - in their classroom / office / workshop
 - on their work computer / laptop
 - on their personal computer / laptop / other electronic device

- practices for disposal of personal pupil data
- speak to key personnel who handle data in the school – Principal, School Secretary etc.

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Pupil Personal Data_ Name Sex Address DoB PPSN	Enrolment Form	Necessity in the public interest	Enrolment Form Roll Book Register Class Lists School Administration software Office Filing Class Filing Office Computer Class Computer DES POD	School Office Classrooms Storage Room	DES HSE DSP	Indefinite on Roll Book
Pupil Special Category Data:- Religion Ethnic Data	Enrolment Form	Consent	Enrolment Form School Administration software Office Filing Office Computer DES POD	School Office Storage Room	DES on consent	25 years on Enrolment Form
Parental Data:- Name Address Phone Nos e-mail	Enrolment Form	Necessity in the public interest AND Protection of vital interest of the subject	Enrolment Form Register School Administration software Office Filing Office Computer	School Office Storage Room	DES HSE DSP	Indefinite on Register

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Teacher Data:- Name Address Phone Nos e-mail Application Form CV Seniority list Details regarding promotions	Recruitment Process Annual Update	Necessity in the public interest AND Contract	School Administration software Office Filing Office Computer	School Office Storage Room	DES	Duration of the Teacher's employment + 7 years
BoM Members Name Address Phone Nos e-mail	BoM Appointment Process	Necessity in the public interest	Office Filing Office Computer	School Office Storage Room	DES Patron Charities Regulator	Indefinite on BoM Minutes
Service providers: (Repairs; builders; maintenance; contractors;) Name Address Phone Nos e-mail	When seeking tenders Given willingly by Electrician	Contract AND Protection of the vital interests of the subject.	Office Filing Office Computer	School Office Storage Room	BoM Other Tradespeople – with connected activities	While the Service provider (e.g.Electrician) is being employed by the BoM
Individual Pupil Assessment and Report carried out by third party professional (e.g. psychologist; Occupational	Parents and school staff	Necessity in the public interest	Office Filing SEN Filing	School Office SEN Classroom	DES NCSE	Indefinitely

therapist; psychiatrist; Speech and Language therapist)						
Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
School Supplies Company Reps Name Address Phone Nos e-mail	Given willingly by Electrician	Contract	Office Filing Office Computer	School Office Classrooms Storage Room	Staff BoM Parents Council	While that Company / Rep is being employed by the BoM
Data Processor:- (e.g. School Administration software; School accounting; School photographs/videos;) Name Address Phone Nos e-mail	Given willingly by Data Processor	Contract AND Consent	Office Filing Office Computer	School Office Classrooms Storage Room	BoM Admin Staff	For as long as the Data involved is being processed on behalf of the BoM
Emergency Services:- Local Doctor Name Address Phone No e-mails	Given willingly by arrangement	Protection of the vital interests of the subject	Office Filing Office Computer	School Office Classrooms Storage Room	BoM Admin Staff Teachers	For as long as the Doctor is being used as for emergency Medical Assistance by the school
Pupils' school work; Yearly Assessments and Reports	Part of the work and purpose of the school	Necessity in the public interest	Office Filing Office Computer	School Office Classrooms Storage Room	Parents Pupils DES NCSE Other schools to where pupils transfer	Until pupil attains 25 years of age

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Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Pupils' accident reports	Recorded at time of accident	Compliance with a legal obligation	Office Filing Office Computer	School Office Classrooms Storage Room	Parents Medical Personnel School insurers Health and Safety Authority. Medical emergency personnel when necessary	Indefinitely
Pupils' notes under Children First	Recorded at time of concern	Compliance with a legal obligation	Secure Office Filing cabinet	Principal's office/secure area.	Tusla Gardaí Parents	Indefinitely
Pupils' School attendance records	Recorded daily in Roll Book	Compliance with a legal obligation	Roll Books Office Filing Office Computer	School Office Classrooms Storage Room	Tusla Parents DES	Until pupil attains 25 years of age Roll Books are stored indefinitely
Pupils' Medical details and details regarding any special condition	At enrolment or as soon as details are known.	Protection of the vital interests of the subject	Office Filing Office Computer	School Office Classrooms Storage Room	School staff NCSE Medical emergency personnel when necessary	Until pupil attains 25 years of age.
Pupils' Individual Education Plans (I.E.P.s)	Parents, teachers, additional professional staff who assess the pupil	Necessity in the public interest	Office Filing Office Computer	School Office Classrooms	Pupils Teachers Parents NCSE DESS	Indefinitely

Data Item	How Collected	Legal basis for collection:	Where Stored	Physical Locations	Shared with	Retention period
Staff members' accidents reports	Recorded at time of accident	Compliance with a legal obligation	Office Filing Office Computer	School Office Principal's Office	Medical Personnel School insurers HSA Medical emergency personnel when necessary	Indefinitely
Staff Medical details, Medial Certs and details regarding any special condition Staff and Volunteers vetting disclosures	From staff members, medical personnel and Medmark Vetting Bureau	Compliance with a legal obligation AND Contract Compliance with a legal obligation AND Contract	Office Filing Office Computer	School Office	DES BoM	Duration of the Staff member's employment + 7 years
Correspondence between parents and Teachers in relation to educational matters	From Parents and Staff	Necessity in the public interest – provision of education	Classroom Filing Office Filing	Classroom Office	Principal BoM	Until the issue is dealt with
Records of complaints made by parents/ guardians	From Parents / Guardians	To comply with Complaints Procedure	Classroom Filing Principal's Filing	Classroom School Office	Principal BoM Insurance Company Legal Advisor	Depends entirely on the nature of the complaint. If it is child-safeguarding, a complaint relating to teacher-

						handling, or an accident, then retain indefinitely
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