

DOCUMENTATION

Reviewed May 2014 (Tracy/Donal)

ACTION

1. To provide and protect individual privacy.
2. To establish guidelines with respect to the collection, use and disclosure of information relating to individuals.
3. To inform parents and caregivers of the procedure for complaints about alleged interferences with individual privacy.

GUIDELINES

1. **Purpose:** the school may not collect personal information unless there is a lawful and specified legitimate purpose for collecting that information relating to the functioning of the school.
2. **Source:** the school must generally collect data directly from the individual concerned (or the parent). However, it is not necessary to comply with this principle if we believe on reasonable grounds that:
 - The information is publicly available
 - The individual concerned authorises collection of the information from someone else
 - Compliance would prejudice the purpose of the collection
 - The information will not be used in a form in which the individual concerned is identified
3. **Collection:** where personal information is collected from an individual, the school must ensure the individual is aware of the purpose for which it is collected, the intended recipients, and the rights of access to and correction of that information.
4. **Manner of Collection:** the school must not collect personal information by unlawful, unfair or unreasonably intrusive means.
5. **Security:** the school must ensure that personal information is secure against loss, modification or misuse to a degree that is reasonable in the circumstances.
6. **Access:** the school must allow an individual to confirm that he / she has a file, access it, check it, and if the individual thinks fit, request correction.
7. **Correction:** where a school holds personal information, the individual concerned is entitled to request correction. Where such correction is not made, the individual is entitled to have a statement of the correction sought attached to the information.
8. **Accuracy:** the school must take steps to ensure that, before use, information is accurate, up to date, complete, relevant and not misleading.
9. **Information Retention:** the school must not keep personal information longer than is required for the purposes for which the information was collected.
10. **Limits of Use:** personal information collected by the school for one purpose may not be used for any other purposes unless the school believes on reasonable grounds that:
 - The information is publicly available
 - The use of the information for that other purpose is authorised by the individual concerned
 - The use of the information for another purpose is necessary to prevent an imminent threat to health or safety
 - The use of the information is in a form in which the individual is not identifiable
11. **Limits on Disclosure:** the school may not disclose personal information unless we believe on reasonable grounds that:
 - Disclosure is one of the purposes for which the information was obtained (e.g. pupil assessment disclosed to parents, ERO etc)
 - That the source of the information is a publicly available publication
 - Disclosure is to the individual concerned
 - Disclosure is authorised by the individual concerned
 - Disclosure of information is necessary to prevent an imminent threat to health and safety
 - The information disclosed is used in such a way that the individual concerned is not identified
 - The use of the information for that other purpose is authorised by the individual concerned
12. **Unique Identifiers:** the school may not allocate a unique identifier (code number for example) to an individual unless the assignment of the unique identifier is necessary to enable the school to carry out its function efficiently.
13. In accordance with the Act, the Board will appoint a Privacy Officer to monitor the use and access of personal information held by the school.
14. Confidential information will be stored in the lockable filing cabinets (in the Principal's office, the Teachers Work Room or the Administration Office area) and will be locked when not attended by staff.