

St. Columba's College Stranorlar



Retention Policy

March 2026

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1. Introduction and Rationale

1.1 Mission Statement and Ethos

St. Columba's College is a Mercy Catholic Voluntary Secondary School within the CEIST Trust and is committed to '**The pursuit of excellence in a caring environment.**' This commitment extends to the professional and lawful management of information belonging to our students, staff, and parents.

1.2 Purpose of Policy

Under the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**, personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. This policy ensures that St. Columba's College:

- Complies with the principle of **Storage Limitation**.
- Retains necessary records for legal, functional, and historical purposes.
- Securely disposes of data that is no longer required.
- Provides transparency to data subjects regarding how long their information is kept and why.

1.3 Scope

This policy applies to all records held by the College, whether in paper or electronic format, including but not limited to student files, personnel records, financial records, and CCTV footage.

2. Data Retention Principles

The College adheres to the following principles when retaining data:

1. **Necessity:** Data is only kept if there is a clear business or legal requirement to do so.
2. **Minimisation:** Only the minimum amount of data required for the purpose is retained.
3. **Security:** Data is stored securely during its retention period.
4. **Timely Disposal:** Once the retention period expires, data is destroyed or anonymised without undue delay.

3. Data Sharing with Third Parties

St. Columba's College shares personal data with the following third parties as required by law, statutory obligation, or via explicit consent for administrative/financial purposes:

- **Statutory Bodies:** Department of Education and Skills (DES), Revenue Commissioners, Department of Social Protection, TUSLA, NCSE, and State Examinations Commission (SEC).
- **Non-Statutory Deductions (Staff):** Trade Union membership fees (e.g., ASTI/TUI), Health Insurance Providers (e.g., VHI/Laya/Irish Life), AVC Providers, Income Continuance/Salary Protection Providers.
- **Financial Institutions:** Staff savings and school payment processing.
- **Digital Systems:** **VSWare** (School Management System) and **P-POD** (Department of Education).

4. Storage and Disposal

4.1 Secure Storage

- **Paper Records:** Stored in locked filing cabinets with restricted access.
- **Digital Records:** Managed through secure school servers (Administrative software) or DES platforms (**P-POD**), utilizing encrypted access and role-based permissions.

4.2 Final Disposition Protocols

- **Secure Shredding:** All paper records past their retention date are shredded using cross-cut equipment.
- **Secure Deletion:** Digital files are purged from live and static databases and from backup cycles.
- **Archiving:** Records of enduring historical or legal value (e.g., Registers, BOM Minutes, Child Protection) are transferred to a secure archive and marked "Do Not Destroy."

5. Linking to Other Policies

5.1 Relationship to Data Protection Policy

This document serves as a specific implementation of the "Storage Limitation" principle outlined in the **St. Columba's College Data Protection Policy**. While the Data Protection Policy provides the broad framework for legal processing and data subjects' rights, this Retention Policy provides the **extensive list of specific data categories** (see Appendix 1) handled by the school and the exact timelines for their storage and disposal.

Note: The school's Data Protection Policy explicitly refers to this document as the definitive schedule for all data inventory and retention periods.

5.2 Linking to Other School Policies

To ensure consistent data management, this policy should be read in conjunction with the following:

- **Admissions Policy:** Governing the collection of applicant data and waiting lists.
- **Anti-Bullying Policy & Code of Behaviour:** Governing the creation and retention of disciplinary and investigation records.
- **CCTV Policy:** Governing the specific retention and overwriting protocols for security footage.
- **Acceptable Use Policy (AUP) & AI Policy:** Governing the digital footprint and data generated through school systems and artificial intelligence tools.
- **Child Protection Policy:** Governing the permanent retention of safeguarding records.

6. Disposal and Destruction

When data reaches the end of its retention period:

- **Paper Records:** Must be shredded (using a cross-cut shredder) or disposed of via a certified confidential waste service.
- **Digital Records:** Must be permanently deleted from primary storage and backup systems.

7. Ratification and Review

7.1 Implementation of Policy

St. Columba's College Data Retention Policy has been ratified by the Board of Management and formally adopted on **12th March 2026**.

We commit to ensuring its implementation in a manner that upholds the College's Catholic identity while fully respecting the rights and dignity of every student.

Signature: P. J. O'Gowan

(Chairperson, Board of Management)

Date: 12/3/26

Signature: S. Power

(Principal)

Date: 12/03/2026

7.2 Review of Policy

The school will monitor / review on a regular basis, and evaluate the policy and all related work and procedures to ensure legal compliance and the maintenance of best practices.

Date for Review: March 2028

Appendix 1: Comprehensive Retention Schedule

Record Category	Purpose & Legislative Basis	Description of Data	Retention Period	Final Disposition
1. Registers & Roll Books	Education Act 1998.	Registers / Staff Roll books.	Indefinitely.	Retain in School until year of Graduation + 2 years; then archive.
2. Enrolment & Admission	Admissions Policy; Education Welfare Act.	Application forms, Transfer forms, Enrolment forms (inc. refused enrolment), Admission Waiting Lists.	5 years after student leaves.	Secure shredding.
3. Identification & Consent	School security / Data processing.	Applicant Photograph, Student ID card data, General/Data Sharing Consents.	Duration of schooling.	Secure deletion / Shredding.
4. Academic Performance	DES Circulars 42/2015 & 34/2016.	End-of-Term/Year Reports, In-school test results, State Exam Results, JCPA data.	Duration of schooling + 7 years.	Secure deletion / Shredding.
5. Exemptions & Scholarship	DES Circular 0052/2019.	Evidence of Irish language exemption, Scholarship Apps (Gaeltacht/Book Rental).	Duration of schooling + 7 years.	Secure deletion / Shredding.
6. Disciplinary & Behaviour	Code of Behaviour; Education Welfare Act.	Disciplinary Records, Bullying Investigations, intervention plans & Reports, Student Contracts.	Duration of schooling + 7 years.	Secure shredding.
7. SEN / Support Services	EPSEN Act 2004; NCSE requirements .	Psychological Assessments, SEN Files, IEPs, NBSS records, Individual Behaviour Plans, Referral Records.	Until student reaches age 25.	Secure shredding.

8. Safeguarding & Welfare	Children First Act 2015; Children Act 2001.	Child Protection Records, TUSLA Reports, HSCL Visit Notes/Case Management.	Indefinitely.	Never destroy.
9. Staff Safeguarding	Institutional Liability.	Child Protection records (allegations against staff, inc. unfounded).	Indefinitely.	Never destroy.
10. Guidance (Educational)	Career planning; CAT4, NGRT (Group Reading Tests)	Educational Guidance notes and assessments.	Duration of schooling + 7 years.	Secure deletion / Shredding.
11. Guidance (Therapeutic)	Duty of Care; Vital Interests.	One-to-one therapeutic counselling records.	Duration of schooling + 7 years.	Secure shredding.
12. Health & Medical	Health & Safety; Insurance.	Student Medical Information, Accident Reports, Incident Logs.	Minors: Age 18 + 7 years. Adults: 10 years.	Secure shredding.
13. Activities & Trips	Risk Management .	Records of Tours/Trips, Permission slips, Itineraries, Risk Assessments.	24 months (Locally).	Secure destruction (Shredding).
14. Digital Systems	Attendance, Timetabling.	Administrative software logs and data entries.	Duration of schooling + 7 years.	Secure deletion from cloud / server.
15. Adult Education	Course Management .	Day Registers and Evening Class Registers.	Graduation/C ompletion + 2 years.	Shredded Jan following expiry.
16. Governance (BOM)	Education Act 1998.	BOM Meeting Minutes.	Indefinitely.	Archived (Permanent).
17. Governance (BOM)	School Governance.	BOM Meeting Agendas and Attendance Sheets.	Date of meeting + 5 years.	Secure shredding.

18. Section 29 Appeals	Education Act 1998.	Records of Section 29 appeal hearings and results.	10 years after appeal conclusion.	Secure shredding.
19. Government Returns	Statutory Returns (DES/ETB).	Any returns identifying individual staff or students (PLSS, FARR).	Depends on nature of return (Pay/Pension: Indefinite).	Archive / Secure Deletion.
20. HR / Staff	National Vetting Bureau Act 2012.	Garda Vetting Form & Outcome, Personnel files.	Duration of employment + 7 years.	Secure shredding.
21. HR / Payroll	Revenue / Social Protection.	PPSN, Bank details, P60s, Superannuation details.	Indefinitely (for pension purposes).	Archive.
22. Security	School Security & Safety.	CCTV Recordings (Internal/External).	28 Days.	Overwritten (unless investigation).