



North Dublin Muslim National School

Ratoath Road

Dublin 7

**Data Protection and Record-Keeping Policy**

May 2018

## **Introduction**

This policy was formulated in May 2014, by the principal in consultation with the teaching staff and Co-Managers of the North Dublin Muslim National School. It was revised in May 2018 to incorporate changes and requirements outlined in General Data Protection Regulations (GDPR).

The purpose of the policy is to outline the requirements of GDPR, identify the records required to be retained by the school and to ensure confidentiality and manageable procedures in relation to access to such records by stakeholders.

## **Rationale**

- A policy on data protection and record keeping is necessary to ensure that the school has proper procedures in place in relation to accountability and transparency.
- It is good practice to record pupil progress so as to identify learning needs.
- A policy must be put in place to ensure a school complies with legislation such as;
  - Education Act, Section 9g requiring a school to provide access to records to students over 18 or parents.
  - Education Welfare Act – requiring a school to report school attendance and transfer of pupils.

## **Relationship to School Ethos**

The North Dublin Muslim National School promotes openness and co-operation between staff, parents and pupils as a means towards providing the caring environment through which a child can develop and grow to their full potential.

## **Aims and Objectives**

- To ensure the school complies with legislative requirements.
- To clarify the types of records maintained and the procedures relating to making them available to the relevant bodies.
- To put in place a proper recording and reporting framework on the educational progress of pupils.
- To establish clear guidelines on making these records available to parents and past pupils who are over 18.
- To stipulate the length of time records and reports will be retained.
- To ensure the school has a plan in place to review the data it holds
- To outline the actions to be taken in the event of a data breach.

## **Guidelines**

The principal assumes the function of data controller (incorporating the role of Data Protection Officer) and supervises the application of GDPR within the school. The data under the control of the principal must be lawfully obtained, only used for the purposes for which it was obtained, be accurate, only

retained for as long as necessary and be accessible by the subject upon request. The data held by the school comes under the following headings:

*1. Personal Data*

This data relates to personal details of the pupils and includes:

- Name
- Address
- Date of birth
- Gender
- Nationality
- Religious belief
- Medical details
- PPSN
- Contact details
- Parents names
- Standardised Test Results
- Attendance Records
- School report cards

These records are stored on Aladdin and are accessible to class teachers, the secretary and the in-school management team. Hard copies of these documents are stored in the pupil portfolios which are kept securely in the principal's office.

*2. Pupil Records*

Pupil records are stored in the pupil portfolios which are kept securely in the principal's office. Pupil records may contain:

- Personal details of the student
- Sensitive Medical Data
- School report cards
- Psychological/Clinical/Occupational Therapy/Speech and Language Assessments
- Standardised Test Results
- Screening Tests such as MIST and NRIT
- Diagnostic Tests/Reports
- Individual Education Plans
- Learning Support/Resource Data such as records of permission/refusal to access LS/RT services in the school
- Details of behavioural incidents or accidents

*3. Staff Data*

This data relates to personal and professional details of the Staff such as:

- Name
- Address
- Date of birth
- Contact details
- Payroll number
- Attendance records

- Qualifications
- School records
- Sick leave
- CPD
- Curriculum vitae
- Classes taught
- Seniority

4. *Administrative Data:*

- Attendance Reports, Roll Book, Registers
- Accident Report Book
- Administration of Medicines Indemnity Form
- Policies
- HSE files
- Board of Management files
- Accounts

These lists are examples of the types of data held and are non-exhaustive.

**Access Requests:**

The following will have access where relevant and appropriate to the data listed above;

- Parents/guardians
- Past pupils over 18
- Health Service Executive
- Designated school personnel
- Department of Education & Skills
- First and second-level schools (where permission has been obtained from parents)

If a parent, guardian, past pupil over 18 or staff member wishes to make an access request to the information held by the school, they should do so in writing to the principal. Data will be provided within one calendar month. Requests deemed by the Data Controller to be manifestly unfounded, excessive or prohibitively costly may be refused, as per GDPR regulations.

A parental authorisation form must be completed by parents in the event of data being transferred to outside agencies such as health professionals etc. Outside agencies requesting access to records must do so in writing giving seven days notice. Parents/Guardians can make such a request by email or in writing. The right to erasure or rectification is available to change any mistakes or inaccuracies by proper authorisation through the same procedures.

**Storage**

All pupil records are stored in the school until the past pupil reaches the age of 21. At this point, records will be handled in accordance with the school's records retention schedule (appendix 1). These records are currently stored securely in the Principal's office.

A pupil profile and selection of records are held by each teacher in his/her individual classroom and passed on to the next teacher as the child moves to the next class.

All completed school roll books are stored in the Principal's office. Access to these stored files is restricted to authorised personnel only. Computerised records and systems are password protected and staff do not share passwords and passwords are unique to staff members and confidential.

### **Data Audits**

An audit of the data held by the school will be conducted every two years with a questionnaire completed by each staff member. Questions used to guide the audit will include:

- *Why are you holding it (the data type)?*
- *How did you obtain it?*
- *Why was it originally gathered?*
- *How long will you retain it?*
- *How secure is it, both in terms of encryption and accessibility?*
- *Do you ever share it with third parties and on what basis might you do so?*

Changes required as a result of the audit will be communicated with staff and a report will be provided to the Board of Management.

### **Data Breaches**

Data breaches occur where electronic or physical data is accessed by an unauthorised third party, where data is lost or where data is stolen. All staff have a responsibility to report breaches of data to the principal, and the principal has a responsibility to report these breaches to the Data Protection Commissioner within 72 hours unless the data is anonymised or encrypted. Where the data is sensitive, the subject(s) of the data are also informed.

### **Success Criteria**

- Compliance with General Data Protection Regulations and Statute of Limitations Act
- Easy access to records
- Framework in place for ease of compilation and reporting
- Manageable storage of records.

### **Roles and Responsibilities**

The school staff, under the direction of the principal as data controller will implement and monitor this policy. Individual teachers will design, administer and record all in-class testing. The principal will ensure records are maintained and stored, particularly the records of students transferring to another school.

### **Implementation Data**

This reviewed policy is effective from May 2018 and replaces the policy ratified in May 2014. All records held from before that date will continue to be maintained in the school, subject to the records retention schedule.

**Ratification and Communication**

This policy was ratified in May 2018 and will be reviewed every four years and amended if necessary.

The policy will be available on the school website and shared drive.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix 1: Retention of Records Schedule



### North Dublin Muslim National School

#### Retention of Records Schedule

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, North Dublin Muslim National School 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 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.

<b>Student Records</b>	<b>Primary</b>	<b>Final disposition</b>	<b>Comments</b>
<b>Registers/Roll books</b>	Indefinitely	N/A	Indefinitely. Archive when class leaves + 2 years
<b>State exam results</b>	N/A	N/A	SEC responsibility to retain, not a requirement for school/ETB to retain.

<b>Records relating to pupils/students</b>	<b>Primary</b>	<b>Confidential shredding</b>	<b>Comments</b>
<b>Enrolment Forms</b>	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
<b>Student transfer forms</b> (Applies from primary to primary; from one second-level school to another)	If a form is used- Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Disciplinary notes	Never destroy	N/A	Never destroy
Results of in-school tests/exams (i.e. end of term, end of year exams, assessment results)	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school).
End of term/year reports	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of school tours/trips, including permission slips, itinerary reports	Never destroy	N/A	Never destroy
Scholarship applications e.g. Gaeltacht, book rental scheme	Student reaching 18 years + 7 years	Confidential shredding	18 is age of majority plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

<b>Sensitive Personal Data Students</b>	<b>Primary</b>	<b>Final disposition</b>	<b>Comments</b>
Psychological assessments	Indefinitely	N/A - Never destroy	Never destroy
Special Education Needs' files, reviews, correspondence and Individual Education Plans	Indefinitely	N/A	Never destroy
Accident reports	Indefinitely	N/A	Never destroy
Child protection records	Indefinitely	N/A	Never destroy
Section 29 appeal	Student	Confidential	Student reaching 18 years + 7 years (6 years in which to



records	reaching 18 years + 7 years	shredding	take a claim against the school, plus 1 year for proceedings to be served on the school)
Enrolment/transfer forms where child is not enrolled or refused enrolment	Student reaching 18 years + 7 years	Confidential shredding	Student reaching 18 years + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Records of complaints made by parents/guardians	Depends entirely on the nature of the complaint.	Confidential shredding or N/A, depending on the nature of the records.	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. Never destroy. If it is a complaint of a more mundane nature (e.g. misspelling of child's name, parent not being contacted to be informed of parent-teacher meeting) or other minor matter, then student reaching 18 years + 7 years (6 years in which to take a claim, and 1 year for proceedings to be served on school)

Staff Records	Primary	Final disposition	Comments
<b>Recruitment process</b>	✓	Confidential shredding	Note: these suggested retention periods apply to unsuccessful candidates only. They do NOT apply to successful candidates, or candidates who are/were also employees already within your school applying for another post/position. For successful candidates, or candidates who are/were also employees already within your school applying for another post/position, see retention periods set out below. 18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Applications & CVs of candidates called for interview	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Database of applications	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Selection criteria	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Applications of candidates not shortlisted	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Unsolicited applications for jobs	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Candidates shortlisted but unsuccessful at interview	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Candidates shortlisted and are successful but do not accept offer	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Interview board marking scheme & board notes	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.
Panel recommendation by interview board	✓	Confidential shredding	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.

Staff personnel files (whilst in employment)	Primary	Final Disposition	Comments
e.g. applications, qualifications, references, recruitment, job specification, contract, Teaching Council registration, records of staff training etc.		Confidential 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 school, plus 1 year for proceedings to be served on the school)
Application &/CV	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Qualifications	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
References	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview: database of applications (the section which relates to the employee only)	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Selection criteria	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Interview board marking scheme & board notes	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Panel recommendation by interview board	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Recruitment medical	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Job specification/description	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Contract/Conditions of employment	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Probation letters/forms	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

POR applications and correspondence (whether successful or not)	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Leave of absence applications		Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Job share	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Career Break	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Maternity leave	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)
Paternity leave	✓	Confidential shredding	Retain for 2 years following retirement/resignation or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater).
Parental leave	✓	Confidential shredding	Must be kept for 8 years - Parental Leave Act 1998 Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years.
Force Majeure leave	✓	Confidential shredding	Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years.
Carers leave	✓	Confidential shredding	Must be kept for 8 years - Carer's Leave Act 2001 Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years
Working Time Act (attendance hours, holidays, breaks)	✓	Confidential shredding	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school). There is a statutory requirement to retain for 3 years
Allegations/complaints	✓	ETB one doesn't have a time period advised	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). <b>Please note</b> the relevant DES Circular 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	✓		Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served). <b>Please note</b> the relevant DES Circular re Disciplinary Procedures in relation to the period of time for which a

			warning remains “active” on an employee’s record.
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<b>Occupational Health Records</b>	<b>Primary</b>	<b>Confidential Shredding</b>	<b>Comments</b>
Sickness absence records/certificates		Confidential shredding Or do not destroy.	Re sick leave scheme (1 in 4 rule) ref DES C/L 0060/2010 Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Pre-employment medical assessment	✓	Confidential shredding  Or do not destroy?	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Occupational health referral	✓	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Correspondence re retirement on ill-health grounds	✓	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Accident/injury at work reports	✓	Confidential shredding	Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy).
Medical assessments or referrals	✓	Confidential shredding Or Do not destroy.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless Medmark assessment relates to an accident/ injury/ incident sustained in relation to or in connection with the individual’s duties within the school, in which case, do not destroy.
Sick leave records (sick benefit forms)	✓	Confidential shredding	In case of audit/refunds, Current year plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)

<b>Superannuation /Pension /Retirement records</b>	<b>Primary</b>	<b>Final Disposition</b>	<b>Comments</b>
Records of previous service (incl.	✓	N/A	DES advise that these should be kept indefinitely.

correspondence with previous employers)			
Pension calculation	✓	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)
Pension increases (notification to Co. Co.)	✓	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)
Salary claim forms	✓	Confidential shredding	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)

Government returns	Primary	Final disposition	Comments
Any returns which identify individual staff/pupils,		N/A	Depends upon the nature of the return. If it relates to pay/pension/benefits of staff, keep indefinitely as per DES guidelines. If it relates to information on students, e.g. October Returns, Annual Census etc., keep in line with "Student Records" guidelines above.

Board of Management Records	Primary	Final disposition	Comments
Board agenda and minutes	✓	N/A	Indefinitely. These should be stored securely on school property
School closure	✓		On school closure, records should be transferred as per <a href="#">Records Retention in the event of school closure/amalgamation</a> . A decommissioning exercise should take place with respect to archiving and recording data.

Other school based reports/minutes	Primary	Final disposition	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 school property and where the images/recordings are retained to investigate those issues.
Principal's monthly report including staff absences	✓	N/A	Indefinitely. Administrative log and does not relate to any one employee in particular: the monthly reports are not structured, either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible. Not a "relevant filing system".
Financial Records	Primary	Final disposition	Comments
Audited Accounts	✓	n/a	Indefinitely
Payroll and taxation	✓		Revenue Commissioners require that records be kept for at least six years after the end of the tax year. Records must be made available for inspection by authorised officers of the Revenue Commissioners or of the Dept. of Social Protection. Note: The DES requires of schools that "pay, taxation and related school personnel service records should be retained <b>indefinitely</b> within the school. These records can be kept either on a manual or computer system.
Invoices/back-up records/receipts	✓	✓	Retain for 7 years

Promotion process	Primary	Final Disposition	Comments
<b>Posts of Responsibility</b>	✓	N/A	<b>Retain indefinitely on master file as it relates to pay/pension etc. (See DES guidelines)</b>
Calculation of service	✓	N/A	Retain indefinitely on master file
Promotions/POR Board master files	✓	N/A	Retain indefinitely on master file
Promotions/POR Boards assessment report files	✓	N/A	Retain original on personnel file in line with retention periods in "Staff Records" retention guidelines above
POR appeal documents	✓	N/A	Retain original on personnel file, and copy of master & appeal file. Retain for duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school). Copy on master and appeal file.

Correspondence from candidates re feedback	✓	N/A	Depends upon nature of feedback. If feedback is from unsuccessful candidate who is not an employee within the school, keep in line with retention periods in "Staff Records" above. If feedback is from successful candidate or from unsuccessful candidate who is already an employee within the school, keep in line with "Staff personnel while in employment" above.
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