



## **Data Safeguarding policy (Ireland)**

January 2018

Last reviewed June 2021

## 1. Introduction

This document sets out the policy of School Thing LTD (“the Company”) with regard to data safeguarding, which is in addition to its Data Protection Policy. The Company views the correct and lawful handling of personal and sensitive data as key to its success and dealings with schools. The Company shall ensure that it handles all data correctly and lawfully, within a safe and secure environment.

## 2. Definitions

**Company** – means School Thing LTD Registered in Ireland. Trading as VSware.

**Customer** – means all clients of the Company, normally schools.

**Employees** – means all members of staff or volunteers appointed by the company.

**Data** – means all electronic records, personal or otherwise, relating to the customer and its learners, staff and stakeholders.

## 3. Safer recruiting

Safer recruiting is an important part of making sure someone is suitable for the role they are undertaking.

The Company will ensure that all relevant safeguarding, recruitment and barring checks have been undertaken for all Employees and keep appropriate training records on a centralised register.

These checks may include:

- Face-to-face interviews
- Checking self- declaration forms for relevancy to the role
- Undertaking criminal record and vetting checks
- Undertaking barred list checks
- Checking references before confirming appointment
- A probationary and supervision period for new employees
- Conducting personal development reviews
- Monitoring conduct in the role
- Conducting in-role risk assessments

The Company will undertake Garda vetting for all Irish employees, in addition to any equivalent International checks where required, to meet any EU and local legislation or directives where required to do so.

#### **4. Training**

As a minimum, training will always include an explanation of the Company's Data safeguarding policy including the context and implementation; this will usually be carried out during Employee induction.

## **2 DATA SAFEGUARDING POLICY**

Training for all Employees will cover:

- Being aware of the importance, and their responsibility, in upholding and maintaining the Data Safeguarding and Data Protection policies of the company
- Being aware of how to report concerns when concerned about a colleague/Employee;
- Understanding and being able to implement safe working practices for Employees;
- Knowing who in the company has Data safeguarding lead responsibility

#### **5. Customer obligations**

The customer is required to register with the Data protection Commissioners Office (DPCO) as a 'Data Controller' or equivalent as required by their local Government and have implemented their own relevant policies and procedures to ensure they comply with appropriate legislative and best practice guidelines. In turn, the customer should also ensure such guidance is adhered to by their suppliers and any external organisations that have been granted access to their data, for which a Data sharing agreements or equivalent should be established between the two.

#### **6. Data Security and Protection**

The Company and its suppliers will be acting as 'Data Processors' as defined by the EU General data protection regulation. The company has taken all reasonable measures to ensure the safety and security of personal information and continues to review these measures on an on-going basis.

All data is stored, processed and transmitted securely, using encryption where necessary, adhering to the current EU data protection directives. The Company also operates appropriate fail-safe and disaster recovery procedures to minimise any data loss and/or disruption to services.

## **7. Contact**

If you have any comments or concerns in regard to this policy, you can contact the company at [support@vsware.ie](mailto:support@vsware.ie) or 01-5549628.

This policy is approved and authorised by:

**Name: David McKeon**

**Position: Managing Director**

**Date: 15th June 2021**

**Signature:**